

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsintrue and correct copy of the
original now remaining of record
in my office.WILLIAM E. DUFFIN
U.S. Magistrate Judge

DATED: 12/30/19

By: CLERK: HEM

In the Matter of the Search of:

6 Facebook Accounts, further described in
Attachment A

Case No. 19-MJ-1382

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A

located in the Eastern District of Wisconsin, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim P. 41(c) is:

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to violations of: Title 18 U.S.C. § 922(a)(1)(A), Title 18 U.S.C. § 922(d), 18 U.S.C. § 544, 18 U.S.C. § 922(a)(1), 18 U.S.C. § 924(b), 18 U.S.C. § 922(a)(9), 18 U.S.C. § 924(h), 18 U.S.C. § 924(g), 22 U.S.C. § 2778(b)(2)(c) and 18 U.S.C. § 371

The application is based on these facts: See attached affidavit.

- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Special Agent Richard Connors, ATF

Printed Name and Title

Sworn to before me and signed in my presence:

Date: 12/30/19



Judge's signature

City and State: Milwaukee, Wisconsin

Honorable William E. Duffin, U.S. Magistrate Judge

Printed Name and Title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, RICHARD CONNORS, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the examination of property, a residential dwelling, and the extraction from that property of evidence described in Attachment B.

2. I am employed as a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") assigned to the Milwaukee Field Office since October of 2015. I have been employed as a full time law enforcement officer for approximately three and a half years. I have received training at the Federal Law Enforcement Training Center in Glynco, GA. I attended the Criminal Investigator Training Program, as well as ATF's Special Agent Training Program. I have received training in the investigation of unlawful possession of firearms, the unlawful transfer of firearms, and the unlawful dealing in firearms without a dealers' license. Prior to becoming a Special Agent with the ATF, I received two (2) bachelor's degrees from Northern Illinois University in the fields of Sociology and International Relations. I have received a Master's degree from Northern Illinois University in the field of American Government.

3. I have received training in the investigation of firearm and drug trafficking. Based on my training, experience, and participation in firearm trafficking investigations, I know and/or have observed the following:

- a. I have utilized informants to investigate firearm and drug trafficking. Through informant interviews and debriefings of individuals involved in those offenses, I have learned about the manner in which individuals and organizations distribute these items in Wisconsin and elsewhere;
- b. I have also relied on informants to obtain firearms (as opposed to licensed gun dealers) and controlled substances from individuals on the streets, known as a controlled purchase;
- c. I have experience conducting street surveillance of individuals engaged in firearm and drug trafficking. I have participated in the execution of numerous search warrants where drugs, firearms, ammunition, and magazines have been seized;
- d. I am familiar with the language utilized over the telephone to discuss firearm and drug trafficking, and know that the language is often limited, guarded, and coded;
- e. I know that firearm and drug traffickers often use electronic equipment to conduct these operations;
- f. I know that drug traffickers commonly have in their possession, and at their residences and other locations where they exercise dominion and control, firearms, ammunition, and records or receipts pertaining to such;

g. I know that firearm and drug traffickers often put their telephones in nominee names to distance themselves from telephones that are utilized to facilitate these and related offenses; and

h. I know that firearm and drug traffickers often use proceeds to purchase assets such as vehicles, property, jewelry, and narcotics. I also know that firearm and drug traffickers often use nominees to purchase and/or title these assets to avoid scrutiny from law enforcement officials. I also know what firearm and drug traffickers may keep photographs of these items on electronic devices.

4. I have participated in multiple firearm and drug trafficking investigations that involved the seizure of computers, cellular phones, cameras, and other digital storage devices, and the subsequent analysis of electronic data stored within these computers, cellular phones, cameras, and other digital storage devices. In many occasions, this electronic data has provided evidence of the crimes being investigated and corroborated information already known or suspected by law enforcement.

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

6. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C § 922(a)(1)(A) (engaging in a firearms business without a license), § 922(d) (transferring a firearm to a prohibited person), and

§ 18 U.S.C. § 544 (smuggling good from the United States), 18 U.S.C. § 922(a)(1) (false statement to a material fact to FFL), 18 U.S.C. § 924(b) (interstate/foreign shipment for felony purpose), 18 U.S.C. § 922(a)(9) (non-resident/non FFL received firearms), 18 U.S.C. § 924(h) (transfer firearm to be used in drug trafficking crime), 18 U.S.C. § 924(g) (interstate travel with intent to commit drug trafficking crime), 22 U.S.C. § 2778(b)(2)(c) (illegal export of munitions), and 18 U.S.C. § 371 (conspiracy).

JURISDICTION

7. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

LOCATIONS TO BE SEARCHED

Facebook Accounts

- Facebook username “Richard P Mosqueda”, ID #100004091722706 and URL www.facebook.com/richardp.mosqueda
- Facebook username “Estrella Ele”, ID# 100027983196223 and URL <https://www.facebook.com/etselec.zemog.7>
- Facebook username “Pedro Gonzalez”, ID# 100033987605649 and URL <https://www.facebook.com/profile.php?id=100033987605649>
- Facebook username “Francisco Javier Robles”, ID# 100004315480687 <https://www.facebook.com/francisco.j.roblesperez>
- Facebook username “Felipe Alvarez”, ID# 100014198617273 and URL <https://www.facebook.com/felipe.alvarez.3150807>
- Facebook username “Marco Santillan”, ID# 100001767077996 and URL <https://www.facebook.com/marco.santillan.148>

PROBABLE CAUSE

8. In May 2018, members of Cartel Jalisco Nueva Generation (CJNG), a transnational criminal organization and drug cartel based in Mexico, attempted to assassinate Luis Carlos Najera Gutierrez de Velasco, the Minister of Labor and former Attorney General for the State of Jalisco, in Guadalajara, Mexico. Based on information shared between federal law enforcement agencies, it is known that this cartel participates in drug trafficking, firearms trafficking, and extreme acts of violence.

9. In response, Mexican law enforcement searched a residence in Guadalajara associated with CJNG members in June 2018. During the search, agents recovered thirty-six firearms, thousands of rounds of ammunition, marijuana, scales, and communication radios. One of the firearms recovered was a Barrett Model 82A1 .50 caliber rifle bearing serial number AA006824.

COBIAN FAMILY

10. A later gun trace revealed that Elias Cobian of Racine, Wisconsin purchased the seized firearm at The Shooters' Sports Center, located at 4900 Six Mile Road in Racine, Wisconsin on April 27, 2018—only 24 days before the assassination attempt and only 43 days before recovery.

11. A short “time-to-crime” is a strong indication of firearms trafficking or “straw buying,” a term used to describe the purchase of a firearm for another person by false representation. Based on my training and experience, I know that “straw buying” is often used to provide a firearm to a person who cannot legally purchase one or to conceal the true owner of that firearm.

12. “Time-to-crime” is a common term used to describe the time between the last known legal possession of a firearm, often the date of purchase from a federal firearms licensee (FFL), and the date of its first known use in a crime, often the recovery date. I know based on information published by the ATF’s Violent Crime Analysis Branch (as of June 16, 2016) that the national average time for a gun to be recovered in a crime by law enforcement after the original purchase date is 10.48 years. I also know that the average time-to-crime for firearms in Wisconsin is 8.18 years.

13. In cooperation with the ATF Attaché Office in Mexico City, the ATF’s Milwaukee Field Office initiated an investigation into Elias Cobian in September 2018.

14. The time-to-crime for Elias Cobian’s Barrett Model 82A1 .50 caliber rifle bearing serial number AA006824 was extremely short. Elias Cobian did not report the Barrett AA006824 as stolen, which was suspicious because the Barrett AA006824 is valued at approximately \$7,400 to \$8,400. The failure to report the theft of a high-value item may be an attempt to remain undetected by law enforcement and evade documentation in police reports.

15. On September 26, 2018, case agents went to Shooters’ Sports Center in Racine, Wisconsin to review the ATF Firearm Transaction Records (ATF Form 4473) for any firearms purchased by Elias Cobian. A purchaser must complete an ATF Form 4473 to purchase a firearm from an FFL.

16. Case agents identified four firearms purchased by Elias Cobian from Shooters’—the Barrett Model 82A1 .50 caliber rifle bearing serial number AA006824 recovered in Guadalajara, Mexico and three KelTec Model PMR30 semi-automatic .22WMR pistols bearing serial numbers WWLU72, WWHC86, and WW7B8L. Those three pistols had been purchased between August 2016 and November 2017.

17. Case agents identified other members of the Cobian family, who regularly purchased firearms at The Shooters' Sport Center. With that information, agents canvassed local federal firearms licensees for other gun purchases made by or linked to the Cobian family. Based on my training and experience, I know that multiple purchases of the same model of firearm can be an indicator of firearms trafficking and that this style of rifle is popular among Mexican drug cartels.

18. The Barrett AA006824 was transferred to Shooters' Sport Center, after being purchased on Gunbroker.com, an online gun auction that uses FFLs as transfer agents between the buyer and seller. I contacted the seller, who informed me that he shipped the firearm to Shooters' Sports Center after he was contacted by Oswaldo Cobian. Oswaldo Cobian had told the seller that his brother Elias Cobian had used Oswaldo Cobian's Gunbroker.com account to purchase the firearm. Oswaldo Cobian asked the seller about the cost of a second Barrett rifle. On April 10, 2018, Oswaldo Cobian texted with the seller and indicated that his brother had sent the check, and the seller responded that he had shipped the Barrett rifle. I observed a copy of the cashier's check from Wells Fargo dated April 9, 2018, in the amount of \$8,425 listing Elias Cobian as the payer.

19. Case agents identified another ATF Form 4473 for Elias Cobian's purchase of another Barrett Model 82A1 .50 caliber rifle bearing serial number AA007538. Elias Cobian purchased that rifle from Fletcher Arms, another federal firearms licensee located at 1441 East Main Street in Waukesha, Wisconsin, on September 18, 2018.

20. On the ATF 4473 for each firearm, Elias Cobian certified that he was the actual buyer/transferee of the firearm.

21. Case agents also reviewed ATF 4473s for the firearms purchased by Oswaldo Cobian at the Shooters' Sports Center. That review indicated that Oswaldo Cobian purchased a Barrett Model M82A1 .50 caliber rifle bearing serial number 1535 on April 25, 2018; a Barrett Model 82A1 .50 caliber rifle bearing serial number AA006768 on February 24, 2018; a KelTec Model PMR30 semi-automatic .22 WMR caliber pistol bearing serial number WWK014 on November 16, 2017; and a KelTec Model PMR30 semi-automatic .22 WMR caliber pistol bearing serial number WW7A37 on August 23, 2016.

22. Case agents observed Oswaldo Cobian on surveillance video at Gander Outdoors, an FFL in Kenosha, Wisconsin, purchasing two rifles, each contained in a brown cardboard box on February 27, 2019. The ATF 4473s for those firearms indicated that Oswaldo Cobian purchased an FN America Model SCAR 17 SFDE 7.62 caliber rifle bearing serial number HC40015 and an FN America Model SCAR 17 SFDE, 7.62 caliber rifle bearing serial number H0C10924.

23. Case agents then observed Oswaldo Cobian return to his address at 6525 High Hill Circle in Racine, Wisconsin and park his vehicle in the driveway. Both Elias Cobian and Oswaldo Cobian have vehicles registered to the address at 6525 High Hill Circle in Racine, Wisconsin. Both identified that location as their current address at or about the same time. Case agents also observed a Chevrolet Silverado truck bearing Wisconsin license plate AG-4081, a vehicle registered to Elias and Oswaldo Cobian, in the driveway in September 2018.

24. On the ATF 4473 for each firearm, Oswaldo Cobian certified that he was the actual buyer/transferee of the firearm.

FACEBOOK COMMUNICATION: OSCAR COBIAN & MARIO FERNANDEZ

25. Pursuant to a federal search warrant, case agents reviewed communications between Oswaldo Cobian's Facebook profile and the Facebook profile "Mario Fernandez," "Chapparito De Oro" or "Chapparo" (Facebook ID: 100001965819835; URL: <https://www.facebook.com/youngbull93>). In those communications, Oswaldo Cobian explained the firearms trafficking scheme with a specific focus on the traffic of .50 caliber firearms. The conversation was a combination of text and audio messages, which have been summarized and translated from Spanish to English below:

February 13, 2018 (audio messages)

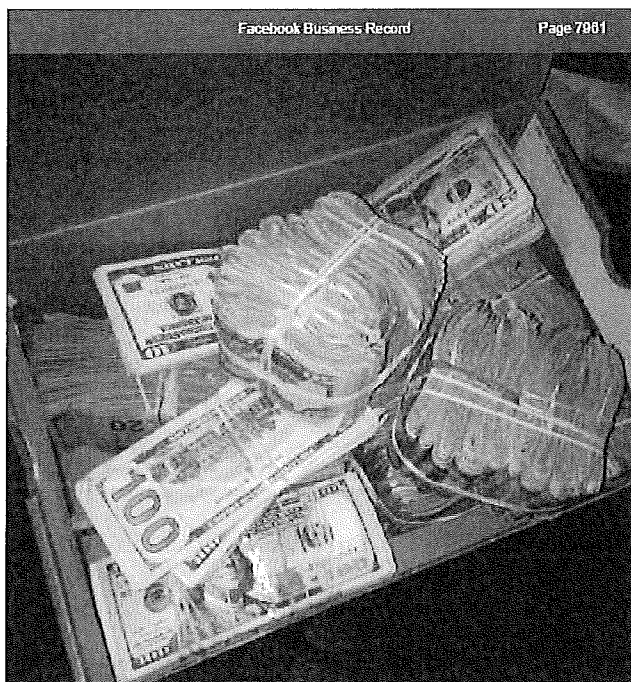
[Oswaldo Cobian sent a typed message asking what Fernandez is up to.]

Fernandez: Nothing, fool. Just at home doing nothing. And you, what are you doing? Are you already working or what?

Oswaldo Cobian: Can you get me some (a few) things from over there? Cool (.....). It's cold. Snow everywhere.

Fernandez: Well, it depends. What? Tell me what you're looking for.

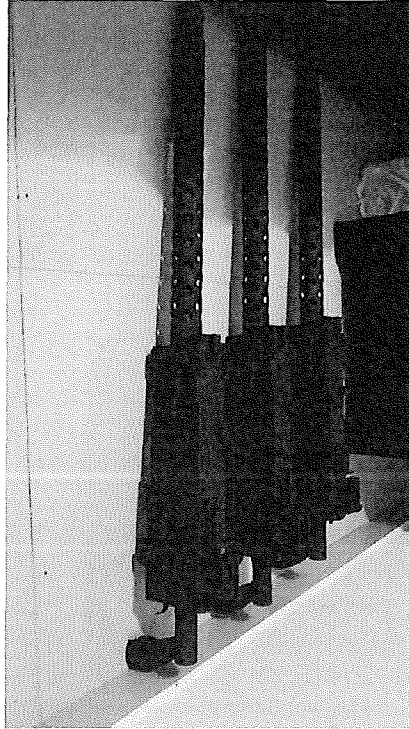
Oswaldo Cobian: And that's just from what we got for those 3 "fierros" (firearms) that we got, fool. (Oswaldo Cobian sends the photo below of a shoebox containing money.)



Fernandez: That's good money, foo'. Hey, fool, what's the (... "ante papas"????) called in English, fool? Don't tell me it's the one that Victor made, no? Or Marcos...with the fuckin'....with hairspray and then he'd toss in a potato in. Haha. Na, kidding. What's it called, fool, that shit, in English?

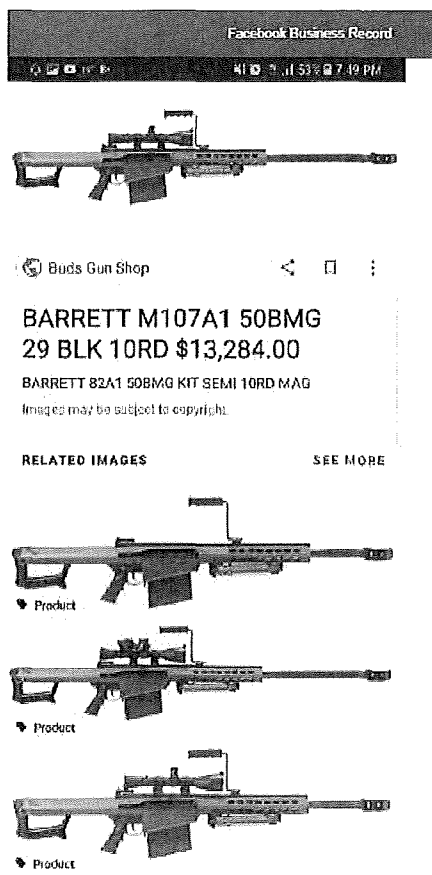
[Oswaldo Cobian sends photos below of objects consistent with Browning M2HB rifles.]





Fernandez: That's the 50, no?

Oswaldo Cobian: Yes, those are 50s. let me look for the link that those fools sent me so that I could find them one of those. It's like military use. With these little fucking things ("changaderas"), fool, and you fire them off and "BOOF, BOOF, BOOF" it sends them far, fool. (Oswaldo Cobian sends a screenshot below of a Barrett M107A1 50BMG selling online at Buds Gun Shop for \$13,284.) The one on top, I have it at my house already. Next week, I'm taking it to California, fool.



Fernandez: What are you bringing over here for? Isn't it going over there?

Oswaldo Cobian: Yeah, fool, but that's where they go down. Through Tijuana...and that's where the guys are that take them down there. You hand it over and right there, those guys give you the money, right there in California, without having to do anything yourself—just obtain/buy/get it. The guys arrive, they give you the money and take the “cohete” and see you later.¹

Fernandez: (Numerous audio clips with no message.)

Oswaldo Cobian: Just like the song says, fool, “just between us”. Because you know how everyone is over there, the women/females and everyone, fool, they start talking and shit.

Fernandez: So do you have to take them to Tijuana or, what?, or do they come here to California? Simon, simon, I don't even get close to there.

Oswaldo Cobian: Those dudes live right there in California, fool. Real close to Los Angeles...and all I do is call them by phone and tell them where the things are and they go and pick them up and they take the money. They take care of everything, you don't have to do

anything or take anything anywhere. They load the firearm to pass/cross it and everything, fool.

Fernandez: That's awesome, fool. But how the fuck am I going to do it, so that I can buy it so that I can sell it to them because I don't have money.

Oswaldo Cobian: I also told that asshole, Cesar—he made me look bad, that son of a fucking bitch—He said, no, simon, simon, I know an Arab and all that shit. I have him here, in one week it'll all be set and it was all bullshit. He just made me believe that, the fool. And to those guys too.

Fernandez: No, that guy is an asshole, he commits to shit without knowing shit. Like I said, I'm not sure but I will keep an eye out and see if one surfaces and I'll let you know.

Oswaldo Cobian: Don't worry about that detail...Just find it, look it over well, in other words have them send photos and everything. And once you have photos and everything, I'll go--- personally, if you want---and you and I will go together and get it and right there I'll give you your "earnings."

Fernandez: All set/good. Simon, fool. To give it a try and see if it works out. And then you can buy it.

Oswaldo Cobian: No, I mean, I know it's not for sure but I'm just saying if you find one, then call me asap and we can earn some quick cash. I know it's hard to find them so that's why I'm saying if you have a chance and you see one around there, make it happen, or else, don't even worry about it, fool.

Fernandez: Simon, simon, but what's that shit called, fool? The potato shooter, fool, that shit.... in English to be able to look for one. And that way, if I find one, that's why I'm saying give me the name. You're looking for a Barrett 50 and another of....of....50s regular. Those that you put underneath or on the ground or something. But send me the name of the other thing.

February 14, 2018 (audio messages)

Fernandez: When you get a chance, call me...but as soon as you get a chance, call me, fool.

Oswaldo Cobian: Give me your phone number so I can call you so that we don't talk through messenger.

Fernandez: Hey fool, I was going to tell you that I am going to talk to some guys that the guy called me....let me borrow some money, fool, you've got money. Let me borrow \$200 and on

¹ This word means firework, but is also for firearm.

Sunday I'll pay you back, I'll send it back on MoneyGram or MoneyTransfer at the bank or whatever. Let me borrow the \$200, fool, and on Sunday I'll give it back.

Oswaldo Cobian: That money is in MX, fool. I don't have access to it. A compa has it. They send me money from over there when we do our thing ("machaca"), they send me money to pay that shit and everything. That's where I get my earnings/cut. Everything is over there, fool. Right now, I don't have anything, I'm broke here in the United States.

Fernandez: Well, it's only \$200, fool and Sunday I'm going to give it back just because it's valentine's day and well, I wanted to get it in, you know. On Sunday, I have a jugada in Pico Rivera and they'll give me money there but I wanted money today to take the girlfriend out.

Oswaldo Cobian: No, well, right now I'm broke until I get paid on Friday. Like I said, all my money is over there but I don't have access to it. Those fools send me....like they're going to send me \$10k, a lady is going to bring it over here to the United States and it's going to be deposited but until day after tomorrow they'll deposit it. But that's just to pay for the "artifact" (firearm) and to take it to califas.

Fernandez: Orale.

Oswaldo Cobian: When you go to Mexico, I'll show you, fool. The little box of dollar bills, fool. But here, like I said, I don't have money, fool. I have all of it in Mexico.

March 5, 2018 (audio and text messages)

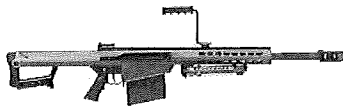
Oswaldo Cobian: Go to the store let's see if they sell you one and how long it takes to give it to you. I'm going over there next week.

Fernandez: Barret .416 rifle

Oswaldo Cobian: 50 Cal

Fernandez: Ok

[Oswaldo Cobian sent the following photographs]:



The Gun Broker



SEMI-AUTO CENTERFIRE RIFLES BRT 82A1 50BMG 2...

PRICE*
\$8,810.92

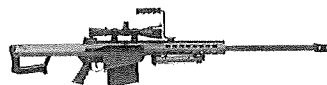
AVAILABILITY
In stock

SEMI-AUTO CENTERFIRE RIFLES - BARRETT
FIREARMS MFG. - BRT 82A1 50BMG 20" 10RD

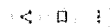
* Check website for latest pricing and availability. Images may
be subject to copyright

RELATED IMAGES

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Buds Gun Shop

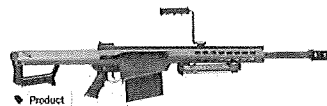


BARRETT M107A1 50BMG 29 BLK 10RD \$13,284.00

BARRETT 82A1 50BMG KIT SEMI 10RD MAG
Images may be subject to copyright.

RELATED IMAGES

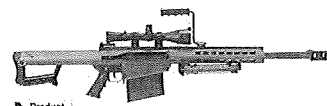
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Product



Product



Product

Fernandez: Hey, fool, I was going to ask you um isn't there another caliber they might want to get, one a little smaller or something? Because here in California, dude, it's bullshit, the laws don't let you—they don't sell those here, fool. I have to go another state, to Oregon or to Arizona. Arizona is right here, close by but do you think they'd want something smaller, a smaller caliber like almost a 50...like here the ones they sell, the largest are 0.416cal Barrett. It's like the 50 but it's...it's...I'll send you a link so you can see them and you can show them and see if they want one or what.

[Oswaldo Cobian sends a screenshot of a semi-automatic centerfire rifle BRT 82A1 from The Gun Broker for \$8,810 and sends a screenshot of a Barrett M107A1 .50 BMG link from Buds Gun Shop for \$13,284.]

Oswaldo Cobian: The one in the photo, on the bottom, fool. The one with the longest "canon", 'cause there's a photo of one with a short "cañon" and one with a long canon. Long canon is better.

Fernandez: Okay, fool, but in California that shit's not sold. I'd have to go to Arizona for one.

Oswaldo Cobian: Look, fool, if you go to Arizona, or whenever you are out there looking around, investigate/check it out and we can make some money, fool. . . Just investigate and make sure they can make them awesome.

Fernandez: I will go myself, fool. I'll drive out there. Anyway, I don't have a record on my drivers license so, there's no reason to dig in to me. I'll go and come back real quick. Fool, look, I can go to Arizona right now, if I want to but all I need is money to put gas in the truck. I already put new tires on the truck and all that shit. All I need is to put gas in and go over there to check out the stores and how much they're selling them for and how the show is out there and I'll buy one real quick out there. . . .

Oswaldo Cobian: Well, investigate/find out how you can get them.

Fernandez: Ok.

Oswaldo Cobian: And the ones they might have in Arizona, there's a lot, they make them there.

April 9, 2018

26. I observed an additional Facebook conversation between Oswaldo Cobian's Facebook profile and the Facebook profile "Mario Fernandez." The conversation was consistent with the trafficking of KelTec PMR 30 .22 WMR pistols and is summarized below:

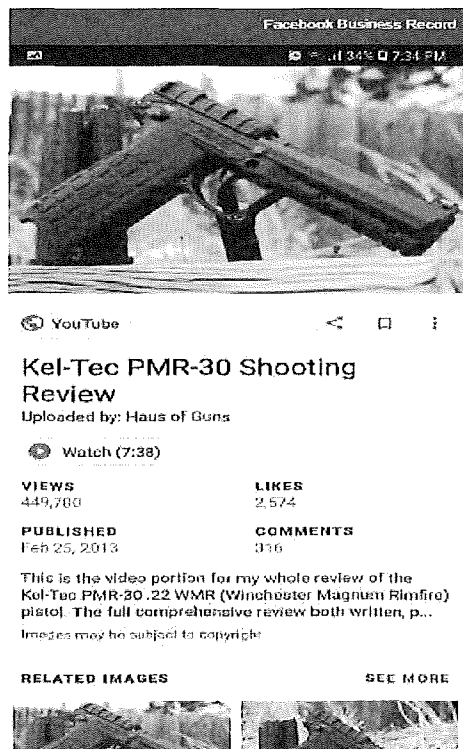
[Oswaldo Cobian and Mario Fernandez exchange phone calls.]

Oswaldo Cobian: See if you can get me some PMR 30s.²

Oswaldo Cobian: They are short.

Oswaldo Cobian: They come with two magazines.

[Oswaldo Cobian sent the following photo]:



Fernandez: Yes, fool. (thumbs up emoji)

Fernandez: Yes.

Oswaldo Cobian: Ask him/them.

Oswaldo Cobian: And if yes, I can send you the money

There are a series of telephone calls made by Mario Fernandez to Oswaldo Cobian.

Oswaldo Cobian: Give me the address fool we be there 15 minutes

Fernandez: Ok

Fernandez: 626417

² Based on my training and experience, I believe that "PMR 30" is a reference to a KelTec Model PMR 30 .22 WMR caliber pistol.

Fernandez: 7365

Oswaldo Cobian: This is your number?

Oswaldo Cobian: ?

Fernandez: Yes.

Oswaldo Cobian: Send me the address.

Oswaldo Cobian: To pass the info

Oswaldo Cobian: And meet up there

Fernandez: 20091 Myron st perris ca 92570

[Oswaldo Cobian and Fernandez exchange telephone calls.]

Oswaldo Cobian: What are you doing, fool?

Oswaldo Cobian: I called and you didn't respond, bastard.

Oswaldo Cobian: I keep getting sent to the mailbox.

(Fernandez makes two telephone calls to Oswaldo Cobian.)

Fernandez: Send me your number

Oswaldo Cobian: 4143661114

Fernandez: Fool I already have my cell

Oswaldo Cobian: Which cell, fool

Oswaldo Cobian: We're going to call this coming weekend

Fernandez: Ok

Fernandez: 6264177365.

**FACEBOOK COMMUNICATION: OSCAR COBIAN, OSWALDO COBIAN, &
HECTOR CORRALES**

27. Case agents identified a Facebook conversation consistent with firearms trafficking between Oswaldo Cobian's Facebook profile and Facebook profile "Oscar Cobian," which has been translated from Spanish to English and summarized below.

August 26, 2018

Oscar: what's up?

Oswaldo: What's up?

Oscar: Are you still in Tonaya?

Oswaldo: Maybe I'll go visit you next week. Just keep it a secret/ shush about it.

Oscar: Okay, you know.

Oswaldo: (sends thumbs up)

Oscar: Fool, I've got another job for you...of that (same thing), if possible/ if you can.

Oswaldo: let's hear it. Tell me.

Oscar: Of the same, but that they arrive in Sinaloa

Oswaldo: Your boss' is already at the house. No fool, I won't set foot in Sinaloa.

Oscar: They're friends of mine/ compadres

Oswaldo: Tell them that instead, I'll buy whichever ones they have in Cali

Oscar: Well, that's why you sell them to them. When you come, you can talk to my friend/compa

Oswaldo: What do they need?

Oscar: Well, firearms

Oswaldo: What kind?

Oscar: I'll tell you in a second

August 30, 2018

On August 30, 2018, Facebook profile "Oscar Cobian" sent Oswaldo Cobian the following screenshot of a conversation between Oswaldo Cobian and "Hector Corrales":



The object visible in the photograph is consistent with an AR15 or M4 style rifle and magazines. In that screenshot, Hector Corrales says that he already has two of these rifles and refers to an M4 Colt firearm. Oswaldo Cobian responded in substance: "Cousin, cousin, I want fifty gadgets," which I believe to be a reference to firearms. In later communications by text and audio message, Oswaldo Cobian asks Oscar Cobian to inquire about how much "Hector Corrales" will pay for each firearm. Oswaldo Cobian indicates that he will look for them "to see if it's worth it." Oswaldo Cobian indicated that he also had a .50 caliber firearm.

28. I reviewed the Facebook page of "Hector Corrales" (Facebook ID: 100002112730064; URL: <https://www.facebook.com/hector.corrales.7>). Further research revealed he had family ties to Pico Rivera, California. On that profile page, I found photographs and postings consistent with those found on Facebook pages associated with Mexican drug cartels. These photographs include subjects wearing masks, donning body armor, and carrying items consistent with AR15 and AK47 rifles. I also found a photograph of a pistol as a religious offering with statues of Jesus Malverde and Santa Muerte. I know from training and experience that Jesus Malverde and Santa Muerte are Mexican folk saints that are symbols associated with cartels in Mexico. I also observed photographs of a subject with items that appeared to be Barrett .50 caliber rifles.

RAFAEL PRECIADO

29. Homeland Security Investigations (HSI) conducted a check of law enforcement databases and learned that Oswaldo Cobian and Elias Cobian's Chevrolet Silverado truck bearing Wisconsin license plate AG-4081 crossed from Mexico to the United States on January 28, 2018. At the time, Elias Cobian and Rafael Preciado were in the vehicle. Case agents noted that

Preciado had previously attempted to purchase a Barrett Model M82 .50 caliber rifle bearing serial number AA007013 from The Gun Shop, a federal firearms licensee located at 1452 Sheridan Road in Kenosha, Wisconsin on September 12, 2018. Preciado ordered the firearm through Rat Worx, Inc., which shipped the firearm to The Gun Shop for the transfer to Preciado. Ultimately, that transfer was denied.

30. Case agents obtained surveillance video of Preciado's attempted purchase at The Gun Shop. That video surveillance showed Preciado inside of the store with a person that agents believe to be Oswaldo Cobian, based on their multiple prior interviews of Oswaldo Cobian and a comparison of his Wisconsin driver's license photograph. The surveillance video also captured a Chevrolet Tahoe in The Gun Shop's parking lot, which matches the description of Oswaldo Cobian's 2017 Chevrolet Tahoe bearing Wisconsin license plate 496-TPJ. During Preciado's attempted purchase, the surveillance video captured Preciado and Oswaldo Cobian looking at firearms together.

31. Case agents reviewed the sales receipt from Rat Worx, Inc., and learned that Preciado provided the telephone number 414-236-0396 and the email address rabanop1962@hotmail.com as his contact information. A review of call records revealed that 414-236-0396 was in contact with 414-366-1114, the telephone number used by Oswaldo Cobian, five times on September 12, 2018—the date of the attempted purchase of the Barrett Model M82 .50 caliber rifle bearing serial number AA007013.

32. Case agents also identified another ATF 4473 for Rafael Preciado from The Shooter's Sports Center, which indicated that he completed the purchase of a KelTec Model PMR30 semi-automatic pistol bearing serial number WLNU531 on June 3, 2018.

33. On the ATF 4473s for each firearm, Rafael Preciado certified that he was the actual buyer/transferee of the firearm.

PATRICK FINNELL, JR.

34. Case agents also identified Patrick Finnell as an associate of Oswaldo Cobian and Elias Cobian. Case agents identified a Facebook profile for “Pat Finnell” (Facebook ID 100005250308551; <https://www.facebook.com/pat.finnell.10>). That Facebook profile was linked to the known Facebook profiles for Oswaldo Cobian and Elias Cobian as “friends.”

35. Case agents conducted a review of ATF 4473s associated with Finnell. Those records revealed that Finnell purchased a Barrett Model 82A1 .50 caliber BMG rifle bearing serial number AA002853 on June 13, 2018, and a Browning M2HB .50 caliber BMG rifle bearing serial number 000043 on June 15, 2018, from The Gun Shop in Kenosha, Wisconsin. He purchased a Barrett Model M82A1 .50 caliber BMG rifle bearing serial number AA002148 on July 26, 2018 from The Shooter’s Sports Center in Racine, Wisconsin. And, he purchased a Barrett Model BA-M82 .50 caliber BMG rifle bearing serial number AA007013 on September 20, 2018 from Gander Outdoors in Kenosha, Wisconsin—the same firearm that Rafael Preciado attempted to purchase on September 12, 2018.

36. Finnell’s first firearm—Barrett Model 82A1 .50 caliber BMG rifle bearing serial number AA002853—was purchased on Gunbroker.com by the username Cobian_ oswald4, which is registered to Oswaldo Cobian of 6225 High Hill Circle, Racine, Wisconsin, 53402-1365, telephone number 414-366-1114, and email address Cobian4@hotmail.com. Gunbroker.com account Cobian_ oswald4 sent the following message to the seller on May 31, 2018:

Hi my name is Pat Finnell, Oswaldo Cobian found the 50 cal rifle for me. I went to a gun shop and the guy that does the transactions was not there. His name and number is Luke Stahl and his number is 262 925 1001. The business name is The Gun Shop LLC. If you could contact me when the information is complete. My phone number is 262 305 8609, I also will send the money tomorrow.

Finnell sent a cashier's check for \$12,999 plus \$175 for shipping to the seller, and the seller shipped that firearm to the federal firearms licensee in Wisconsin. That firearm was transferred to Finnell on June 15, 2018.

37. Case agents contacted the seller for the Barrett Model M82A1 .50 caliber BMG rifle bearing serial number AA002148. That seller indicated that the Gunbroker.com account Cobian_oswald4 won the auction for that firearm and that he was contacted by a subject with a Spanish accent, who informed him that the firearm was actually for Patrick Finnell.

38. A short time later, the seller was contacted by text message by a subject who introduced himself as Pat Finnell and a friend of Oswaldo Cobian and who inquired about where and how to send payment. The seller indicated that Oswaldo Cobian later contacted him to check on the progress of the transaction. Case agents reviewed communications between the seller and the Gunbroker.com account Cobian_oswald4. On July 25, 2018, Gunbroker.com account Cobian_oswald4 stated in substance: "Hey just wondering what's going on you got your money and i still don't have mi rifle I text you earlier and you didn't text me back when are you going to send it??" A few days later, the seller responded and indicated that the firearm was for Patrick Finnell and that it was illegal for Finnell to purchase and then give a firearm to Oswaldo Cobian. The Gunbroker.com account Cobian_oswald4 then responded in substance:

No it was Patrick who send you the message we work together and he ask me iff he can send a message from mi account iff see if you would answer be cuse he was worried about you did not guet back to him wen you told him Monday that you was gonna send him the trucking number. Sorry for the misunderstanding. Have a good night.

The seller received a cashier's check from BMO Harris for the Barrett Model M82A1 bearing serial number AA002148 in the amount of \$6,300 dated July 13, 2018 listing Patrick W. Finnell as the payer.

39. The seller also agreed to send .50 caliber BMG ammunition to Finnell separately from the firearm. Finnell sent the seller an address of 2665 4 ½ Mile Road, Racine, Wisconsin 53402, as the address to ship the ammunition. The seller never shipped the ammunition, and Finnell never inquired to its whereabouts. The seller found this suspicious because of the relatively expensive cost of .50 caliber ammunition.

40. Pursuant to a federal search warrant, case agents obtained communications between the Facebook accounts for Patrick Finnell and Oswaldo Cobian. Those communications confirm that Oswaldo Cobian acted jointly with Patrick Finnell to purchase the firearm described above. On July 8, 2018, Oswaldo Cobian sent Finnell the contact information for the seller of the Barrett Model M82A1 bearing serial number AA002148.

41. As indicated above, Finnell also purchased a Barrett Model M82 .50 caliber rifle bearing serial number AA007013 on September 20, 2018—the same firearm that Preciado had attempted to purchase on September 12, 2018. During that attempted purchase, Oswaldo Cobian and Rafael Preciado traveled to The Gun Shop in Racine, Wisconsin. When Preciado was denied during the background check, Oswaldo Cobian asked the FFL to place the firearm in his name. The FFL declined to do so. The Gun Shop then returned the firearm to Rat Worx, the FFL in Mt. Morris, Illinois that had sent the firearm. On September 13, 2018, Oswaldo Cobian returned to The Gun Shop to pay for the return.

42. Case agents later contacted Rat Worx and obtained invoices and shipping manifests showing that the firearm was shipped back from The Gun Shop to Rat Worx on September 14, 2018, and then shipped from Rat Worx to Gander Outdoors in Kenosha on September 18, 2018. The sales receipt listed Pat Finnell as the purchaser. According to those records, Finnell only paid the transfer charges for the rifle—not the \$7,446.97 that Preciado had already paid for the firearm. I know from my training and experience this is a strong indication of organized firearms trafficking and organized straw buying.

43. On the ATF 4473 for each firearm, Patrick Finnell certified that he was the actual buyer/transferee of the firearm.

VICTOR COBIAN

44. Case agents conducted a review of ATF 4473s associated with Victor Cobian, the cousin of Elias Cobian and Oswaldo Cobian. Those records indicate that Victor Cobian purchased a Barrett Model M82A1 .50 caliber rifle bearing serial number AA007354 on or about August 16, 2018; a Barrett Model 82A1 .50 caliber BMG rifle bearing serial number AA007837 on or about October 9, 2018; a Barrett Model 82A1 .50 caliber BMG rifle bearing serial number AA007825 on or about October 9, 2018; an FN Herstal Model M249S 5.56 rifle bearing serial number M249SA05209 on or about October 9, 2018; and, an FN Herstal Model 9C nine-millimeter pistol bearing serial number CSU0054557 on or about August 3, 2018 from Chambered, a FFL in Sturtevant, Wisconsin. Victor Cobian listed the telephone number as 847-505-0429 and the email address Chapo6478@gmail.com as his contact information during that first purchase.

45. Case agents spoke with employees of Chambered, who indicated that Victor Cobian purchased approximately 20,000 rounds of .50 caliber ammunition, the caliber of ammunition for the Barrett rifles listed above, in 2018 at an approximate cost of \$2.30 per round. The total value of the ammunition purchased by Victor Cobian was approximately \$46,000.

46. On October 25, 2018, case agents interviewed the owner of Chambered and learned that Victor Cobian only conducted business with Jeremiah Cholip, an employee of Chambered. Agents also learned that Victor Cobian commonly paid in cash and that Cholip had brokered a purchase of 31 firearms, a mix of handguns and rifles, between Victor Cobian and a private seller on October 29, 2018 for an estimated amount of \$60,000 to \$70,000 in cash. Telephone records show that Victor Cobian, using the telephone number 847-505-9429, communicated with Jeremiah Cholip, using the telephone number 262-902-6757, approximately 176 times between September 5, 2018, and October 10, 2018. This phone number was provided to law enforcement for Jeremiah Cholip during a noise complaint.

47. A review of ATF's Electronic Tracing System (eTrace) reveals that Victor Cobian is linked to multiple firearm traces and recoveries. Some of the traces and recoveries were linked to criminal activity including possession of heroin, marijuana, and cocaine, and possession of firearms by felons.

48. On the ATF 4473 for each firearm, Victor Cobian certified that he was the actual buyer/transferee of the firearm.

CRISTINA COLE

49. Based on a publicly published obituary, case agents know that Cristina Cole is the sister of Victor Cobian and that Stephanie Cobian is the wife of Victor Cobian. A review of ATF

4473s revealed that Stephanie Cobian and Cristina Cole purchased multiple firearms from Chambered between September 30, 2018, and October 24, 2018. Cole purchased an FN Herstal Model M249S 5.56 caliber rifle bearing serial number M249SA07138 and an FN Herstal Model SCAR 5.56 caliber rifle.

50. On the ATF 4473 for each firearm, Cristina Cole certified that she was the actual buyer/transferee of the firearm.

OAK CREEK FIREARM CASES

51. On October 31, 2018, six days after the interview at Chambered, case agents responded to the Oak Creek Police Department after learning that several Barrett .50 caliber rifle cases and KelTec PMR30 pistol cases were recovered from a dumpster near 3950 East High Street in Oak Creek, Wisconsin. In total, police recovered five Barrett rifle Pelican cases, three KelTec PMR30 cases bearing the serial numbers WWLU72, WW7A37, and WWHC86, and one Plano long gun case. One case had a serial number matching a firearm purchased by Oswaldo Cobian, and two cases had a serial number matching firearms purchased by Elias Cobian.

52. This location is approximately 0.3 miles from a bar operated by Victor Cobian, the residence of Oscar Cobian, and the residence of Cristina Cole. This business is also frequented by Elias Cobian and Oswaldo Cobian. Based on my training and experience, this was suspicious because a Barrett rifle Pelican case costs approximately \$375 and is important for maintaining the condition of an expensive firearm.

53. Case agents inspected the Barrett rifle cases and found manuals for Barrett .50 caliber and .416 rifles. I know that a Barrett .416 rifle was shipped to Chambered, an FFL in Sturtevant, Wisconsin for Victor Cobian, the cousin of Elias Cobian and Oswaldo Cobian. That

Barrett .416 was later returned to the originating FFL. That originating FFL indicated that the Barrett .416 rifle was, in fact, returned, but believed the firearm was returned in a box for a .50 caliber rifle.

54. Case agents also found a Barrett inspection tag for a Barrett .50 caliber rifle with serial number AA007013—the same firearm that Rafael Preciado attempted to purchase and that Patrick Finnell did purchase.

PREMISES SEARCH WARRANT EXECUTIONS

55. On March 1, 2019, case agents executed search warrants at five residences and two vehicles in Wisconsin—belonging to Oswaldo Cobian, Elias Cobian, Victor Cobian, Stephanie Cobian, Cristina Cole, Patrick Finnell, and Jeremiah Cholip. In total, case agents recovered approximately 52 firearms associated with the Cobian family, including two FN SCAR rifles from the residence of Oswaldo Cobian. Case agents determined that Oswaldo Cobian purchased these two rifles on February 27, 2019, from Gander Outdoors in Kenosha, Wisconsin. However, case agents could not locate any Barrett .50 caliber rifles, any FN Model M249S rifles, or any FN SCAR rifles purchased in 2018. This indicates that the members and associates of the Cobian family no longer possess the many high-powered, expensive firearms.

56. Case agents also seized 29 electronic devices, a drop-in auto sear—considered a machine gun by regulation—from the residence of Victor Cobian, and a homemade silencer from the residence of Jeremiah Cholip. One of the 29 firearms recovered from Victor Cobian's residence included a pistol with a custom grip inscribed with "CJNG"—the acronym for Cartel Jalisco Nuevo Generacion.

57. During an on-scene interview, Victor Cobian told case agents that he kept firearms at his cabin in northern Wisconsin and that his FN M249S SAWs and Barrett rifles were there. Victor Cobian described the cabin as near Eau Claire, Wisconsin. Victor Cobian admitted that he knew that Elias Cobian and Oswaldo Cobian were buying Barrett .50 caliber rifles, but denied knowing what Elias Cobian and Oswaldo Cobian did with these firearms.

58. Case agents conducted a forensic analysis of Victor Cobian's cellphone and manually reviewed a WhatsApp conversation between Victor Cobian and "Uli La Bota." Case agents located a Facebook profile "Ulises Paz Garcia," with a matching profile photo as that of the WhatsApp user "Uli La Bota." Facebook profile "Ulises Paz Garcia" is also "friends" with the Facebook profiles "Elias Cobian" and "Cristina Cobian-Michel."

59. Between August 27, 2018, and December 31, 2018, "Uli La Bota" and Victor Cobian exchanged messages in Spanish using coded language about the traffic of firearms, referring to the firearms as girls, virgins, and sneakers.³ Agents and analysts reviewed and translated these conversations from Spanish to English.

60. In response to multiple coded inquiries from "Uli La Bota" about firearms, Victor Cobian indicates that there were delays with the order. On or about September 24, 2018, Victor Cobian wrote in substance: "On Saturday I am going to take a photo with the little girl sicaria." "Uli La Bota" asked in substance: "How much was it after all," to which Victor Cobian

³ In a later conversation on or about December 9, 2018, WhatsApp user "Uli La Bota" sends Victor Cobian a message that states: "Look compa the dresses that I bought for the girl. They are going to bring them to me." Along with that message, he sent two photographs of firearm sights.

responded in substance: “Like 28. I’ll send you a photo of everything.” On September 30, 2018, Victor Cobian sent the following photograph with the caption “your godson’s new toy”:



61. The photograph depicts a small female child, identified as Victor Cobian’s daughter, holding a firearm that appears to be an FN SCAR .556 caliber rifle. That photograph was taken at approximately 6:01 p.m. on September 30, 2019. In response, “Uli La Bota” indicates that he will make a deposit into the bank account belonging to Victor Cobian’s mother and states in substance: “I am going to start equipping it. recommend a good look (style). Can I order that via internet.”

62. Case agents are unaware of any FN SCAR rifles personally purchased by Victor Cobian. However, Victor Cobian’s sister Cristina Cole purchased a black FN SCAR .556 caliber rifle bearing serial number LC36343 from Chambered, an FFL in Sturtevant, Wisconsin on September 30, 2018—the same day as the photograph above. When case agents executed the

search warrant at Victor Cobian's residence, agents located one empty FN SCAR rifle box with the serial number removed, such that no identifying information could be obtained.

63. On March 6, 2019, case agents executed a warrant at Cole's residence. Agents did not locate any firearm boxes, but did recover Cole's cellular phone. A forensic analysis of Cole's cellphone revealed a conversation between Cole, using telephone number 262-221-2468, and Victor Cobian, using telephone number 847-505-9429, where Cobian told Cole to "just walk in the front door" at about 4:14 p.m. Victor Cobian then sent the photograph of his daughter holding an FN SCAR rifle at about 6:01 p.m. to "Uli La Bota."

SOI-1 PROFFER

64. Since March 2019, SOI-1 met with federal agents under the protection of a federal proffer agreement multiple times. SOI-1 stated that s/he began trafficking firearms in 2017. SOI-1 stated that s/he was drinking at a bar called "El Amigo Juan" in Tonaya, Mexico in December 2017, when s/he met with an old friend who goes by the name "Chindu." SOI-1 knew "Chindu" from Mexico and for several years. SOI-1 identified "Chindu" as Jesus Cisneros who resides in Cofradia, Jalisco, Mexico.

65. Case agents located a Facebook profile for "Jesus Cisneros" (username: Jesus Cisneros; Facebook ID: 100033552382966; <https://www.facebook.com/profile.php?id=100033552382966>) and displayed the profile picture to SOI-1. SOI-1 indicated that the picture resembled Cisneros, but the picture only showed the bottom three-quarters of Cisneros' face. By viewing the publicly viewable "friends" section for Facebook profile "Jesus Cisneros," case agents discovered that he was "friends" with the Facebook profile "Elias Cobian." The Facebook page also contained several "friends" with the

last name "Preciado" and "Cobian." Several of the "friends" located on the page listed their hometown as Tonaya, Mexico, which is where SOI-1 met Cisneros in December 2017.

66. Case agents also located a Facebook profile "Jesus Cisneros Hernandez" (username: Jesus Cisneros Hernandez; Facebook ID: 100011433766434; <https://www.facebook.com/jesus.cisneroshernandez.528>). This is believed to be a second Facebook page for Cisneros. Agents displayed a picture from this Facebook page to SOI-1, who stated that it was Cisneros. Agents queried the publicly viewable portion friends section for the page "Jesus Cisneros Hernandez." Agents discovered that on the Facebook page of "Jesus Cisneros Hernandez," it showed that he was "friends" with the following Facebook profile: "Elias Cobian." Cisneros' Facebook page also contained several "friends" with the last name "Preciado" and "Cobian." Several of the "friends" located on the page listed their hometown as Tonaya, Mexico.

67. According to SOI-1, Cisneros told SOI-1 that if s/he could obtain Barrett .50 caliber rifles on Cisneros's behalf and then deliver them to individuals in California, s/he would get paid \$18,000 per rifle. Cisneros told SOI-1 that Cisneros had "permission" to obtain and sell firearms in the area of Tonaya-Cofradia, Mexico. SOI-1 understood this to mean that Cisneros had permission from either the cartel and/or corrupt government officials to conduct illegal activity of firearms buying and selling in the area. SOI-1 agreed to this firearms trafficking arrangement.

68. SOI-1 stated s/he believed the firearms then went to Mexico through Tijuana. SOI-1 advised that Cisneros also asked for Browning M2HB .50 caliber rifles, which SOI-1 also purchased and delivered to California. SOI-1 stated that shortly after SOI-1 made the agreement

with Cisneros, Victor Cobian also made a similar agreement with Cisneros to purchase firearms on Cisneros' behalf and then deliver those firearms to individuals in California. SOI-1 further stated that he believed these firearms were being trafficked to the cartel that controls Jalisco—Cartel Jalisco New Generation.

69. SOI-1 advised that Cisneros contacted and told SOI-1 what type of firearm(s) he would like SOI-1 to purchase. SOI-1 then purchased those firearm(s), and then s/he delivered the guns for Cisneros by driving them to the Los Angeles, California area. SOI-1 would remove the serial numbers in the Los Angeles area, and then contact a telephone number provided by Cisneros. A person then met SOI-1, took the firearm(s), and the person provided some or all of the cash at that time.

RAMIREZ & MOSQUEDA

70. SOI-1 believed that the people receiving the firearms were from San Diego or Tijuana. SOI-1 described one of the people as a man with a “crooked eye” and a Ford F-150, later identified as Richard Padua MOSQUEDA (DOB: 11/29/1966). SOI-1 described the other individual who received the firearms in California as a woman under the age of 35, slightly chubby, named “Laura” who s/he believed was from San Diego. Through telephone and address information, case agents identified RAMIREZ (DOB: 04/01/1991) of Chula Vista, California. SOI-1 identified as RAMIREZ as “Laura” who s/he met in Los Angeles.

71. SOI-1 also stated that he met an associate in Las Vegas, Nevada named “Dejan,” later identified as Dejan Zoric, through Victor Cobian.⁴ During the second meeting, SOI-1 stated

⁴ Through Facebook records, case agents identified Dejan Zoric (DOB: 1976) of Nevada as a suspect. A comparison of Zoric's Facebook profile picture and his Nevada Department of Motor Vehicles photograph are consistent.

that s/he flew from O'Hare International Airport to Las Vegas, Nevada. SOI-1 checked a Barrett .50 caliber rifle into luggage during the flight, which s/he was transporting to California for Cisneros. After arriving in Las Vegas, SOI-1 rented a vehicle to transport the rifle to California. SOI-1 was instructed by Victor Cobian to travel to Zoric's residence in the Las Vegas area and obtain firearms from Zoric for transport to California. Victor Cobian told SOI-1 that Zoric was a good friend and trusted. Once SOI-1 arrived at Zoric's home, SOI-1 pulled into the garage, met Zoric, and loaded two or three gun boxes into the rental vehicle. After receiving the firearms from Zoric, SOI-1 traveled to California and transferred the firearms to RAMIREZ.

72. After this transaction, Victor Cobian traveled to Atlanta, Georgia to receive payment for the firearms. Victor Cobian asked SOI-1 if s/he paid Zoric when s/he was in Las Vegas. SOI-1 told Victor Cobian that s/he did not, and Victor Cobian indicated that he would pay Zoric from his cut. SOI-1 received a payment from Victor Cobian at that time.

Case agents conducted a forensic analysis of Victor Cobian's phone and located a contact saved as "Dejan." Case agents recognized the number as the one belonging to Zoric. Victor Cobian's cellphone contained a text message from Zoric to Victor Cobian stating in substance: "8684 Moreno Mountain Ave"—the address registered to Zoric with the Nevada Department of Motor Vehicles. Victor Cobian's cellphone also contains a conversation on October 20, 2018 discussing the Crossroads of the West Gun Show. During that conversation, Victor Cobian indicates that "Theres none," to which Zoric responds: "Of what we like ?" Cobian confirms. In February 2019, case agents at the ATF's Las Vegas Field Office were alerted by a local federal firearms licensee of a suspicious purchase of 10 FN America M249 SAW rifles by Ethan Erhardt, following an earlier purchase of 10 M249 rifles and 10 Barrett .50 caliber rifles in December 2018 and January 2019. Erhardt had paid with cash for each purchase. Those 30 rifles had a total approximately value of \$300,000. Case agents conducted surveillance and observed Erhardt and Boris Trgovcevic load the firearms into Trgovcevic's Ford Transit van. During a later forensic analysis of Trgovcevic's cellphone, case agents found conversations between Trgovcevic and Erhardt about the purchase, payment, and shipping of those firearms. Case agents also observed texts between Trgovcevic and Zoric about the straw purchase of M249 SAW and Barrett .50 caliber rifles. On Victor Cobian's cellphone, case agents found a text message dated December 18, 2018 between Cobian and Zoric that stated in substance: "We are vc trying to get in to boris gate." Case agents saw the publicly viewable section of Zoric's Facebook page and located two profiles for Boris Trgovcevic in his "friends" section: "Boris Trgovcevic" and "Boris Trg."

73. Case agents conducted a forensic analysis of Oswaldo Cobian's cellular phone. In a message between Cobian and an associate, he provided the bank account information for "Laura Yahira Ramirez" and "Laura Y Ramirez." In total, Oswaldo Cobian appeared to have information about three of RAMIREZ's bank accounts. Following a screenshot of RAMIREZ's bank information, Cobian texted "16195085311"—the same telephone number that Cisneros provided for RAMIREZ.

74. Based on my training and experience, I know that it is not uncommon for payments to be wired directly to bank accounts in organized drug and firearms trafficking and that disbursing money across multiple accounts at different financial institutions can avoid scrutiny from bank security and law enforcement.

75. Case agents located the following Facebook profile "Laurita Yahaira" for RAMIREZ (username: Laura Yahaira; Facebook ID: 100001107718926; <https://www.facebook.com/l.y.rmrz>). Agents know that RAMIREZ's middle name is Yahaira. I displayed a photograph of the publicly viewable profile picture for the Facebook page "Laurita Yahaira" to SOI-1, and SOI-1 stated the person in the photo appeared to be RAMIREZ. Case agents compared the photo from the Facebook page of "Laurita Yahaira" to RAMIREZ's California Department of Motor Vehicles photo, and the two appear consistent. The photograph on the Facebook page "Laurita Yahaira" depicts RAMIREZ sitting in a Jeep.

76. Case agents drove by RAMIREZ's address at on April 5, 2019, and observed a vehicle in the driveway. Case agents observed that same vehicle parked at the address on April 30, 2019, May 2, 2019, and August 15, 2019. A review of law enforcement databases revealed that RAMIREZ crossed the border between the United States and Mexico twice in that vehicle in

the past 18 months. That vehicle is registered to RAMIREZ at the same address, as of September 9, 2019.

77. On May 8, 2019, case agents observed a subject matching RAMIREZ outside of her residence conversing with a male. After the conversation, RAMIREZ then entered that address. Case agents believe that this subject was, in fact, RAMIREZ.

78. Case agents also know that Laura Ramirez has received mail at this address in the past and received a package at this address as recently as August 24, 2019.

79. Case agents confirmed that RAMIREZ has crossed the border at Tijuana approximately 156 times in the last 18 months. She has crossed the border between the United States and Mexico approximately 56 times since January 1, 2019. Case agents confirmed that RAMIREZ crossed the border between the United States and Mexico as recently as September 17, 2019, in another Jeep vehicle.

80. Agents displayed a California Department of Motor Vehicle's photo of RAMIREZ to SOI-1, and SOI-1 confirmed the person in the photo was "Laura."

81. Case agents conducted surveillance of RAMIREZ on September 12, 2019, and observed RAMIREZ at the Little Caesar's. Case agents observed RAMIREZ drive to 1641 Pacific Rim Court in San Diego, California, an industrial area.

82. Once there, RAMIREZ pulled near two or three other vehicles. Case agents observed the vehicles in the parking lot for approximately one hour and observed several unidentified individuals around the vehicle, open and close the vehicle doors and trunk, and peer into the vehicles with a flashlight. Some of those vehicles were observed driving around the area

multiple times, conducting what appeared to be countersurveillance. Approximately 30 minutes later case agents drove by RAMIREZ's address and observed the blue Dodge Magnum parked outside of the residence.

83. Case agents observed that the email address laurita.rmrz@gmail.com was used as the registrant's email address for this Facebook profile. Case agents also noted that RAMIREZ provided laurita.rmrz@gmail.com as the email for her Netflix account in a Facebook conversation.

84. Pursuant to a federal search warrant, case agents obtained records and information associated with RAMIREZ's Google account. That information reveals that on November 25, 2017, RAMIREZ conducted multiple Google searches for "Chula Vista Gun Store Chula Vista, CA" and "chula vista gun store." On December 13, 2017, RAMIREZ conducted Google searches for "cartel de jalsico" and "jalisco new generation cartel founders." RAMIREZ's Google account also visited the Wikipedia page for Jalisco New Generation Cartel. On January 7, 2018, RAMIREZ conducted Google searches for other gun stores in Chula Vista, California. On January 15, 2018, RAMIREZ conducted Google searches for "gerardo delgado cobian."

85. Case agents obtained Laura RAMIREZ's Facebook communications pursuant to a federal search warrant. During that review, I observed that RAMIREZ was previously Facebook "friends" with Facebook profile "Jesus Cisneros" (Facebook ID: 100032353987887; URL: www.facebook/profile.php?id=100032353987887). A review of the Facebook profile "Jesus Cisneros" did not have a profile photograph visible, but did have common Facebook "friends" with other Facebook profiles associated with Jesus "Chindu" Cisneros.

86. A toll records analysis indicates that Jesus Cisneros communicated with RAMIREZ three times on May 9, 2019, once on May 10, 2019, and twice on May 24, 2019.

87. Case agents also viewed a conversation between RAMIREZ and Facebook username “Richard P Mosqueda” (Facebook ID 100004091722706; URL: www.facebook.com/richardp.mosqueda). I located a California Department of Motor Vehicles photograph for Richard Padua MOSQUEDA (DOB: 11/29/1966) of Chula Vista, California. That photograph matched the appearance of the publicly viewable photographs from the Facebook profile “Richard P Mosqueda.”

88. SOI-1 reviewed a photograph of MOSQUEDA. He/she advised that it had been some time since he/she had met with MOSQUEDA, but believed the photograph was the second subject—the man with a “crooked eye” and a Ford F-150— he met in California, to whom SOI-1 provided firearms for Cisneros.

89. Case agents reviewed a law enforcement database and determined that MOSQUEDA crossed the border between the United States and Mexico approximately 26 times in that 2002 Ford truck since August 16, 2019. MOSQUEDA’s most recent border crossing occurred on September 10, 2019. In total, case agents confirmed that MOSQUEDA has crossed the United States border near Tijuana, Mexico, approximately 282 times in the last 18 months. This can be a strong indicator of a smuggler. It appears, however, that MOSQUEDA’s wife may reside in Tijuana.

90. In the above referenced Facebook communication between RAMIREZ and MOSQUEDA, the conversation appeared consistent with subjects engaged in the illegal smuggling of goods into Mexico from the United States on behalf of a third party or

organization. The conversation is also consistent with the scheme discussed by SOI-1. The following are summaries of these conversations translated from Spanish to English:

May 21, 2018

Mosqueda: Hi Laura do you know anything about the job?

Ramirez: Didn't "Gera" talk to you?

May 22, 2018

Mosqueda: No, he hasn't spoken with me the truth is that I need to get some money together for my sister's thing and for my youngest daughter's birthday on Saturday and I don't want the same thing to happen to me like with my other daughter because of "turi" (0%) I wasn't able to do anything for her birthday see if you can get in touch with him I sent him a WhatsApp but he hasn't even opened it if you can do it please.

Ramirez: Yes he told me that he was going to call tomorrow because he has something pending for you only he didn't tell me what time. I think that maybe before noon/midday.

Mosqueda: Ah, okay, laurita it's just that it's urgent for me and we are still owed for the last trip. Once I get paid, I'll give you your money ok. I barely have gasoline to get there/ get over there.

Ramirez: I'll call him tomorrow to see what your cut is, he said that something good came up for tomorrow, well, today, Tuesday. Yes, I already told him that money is needed. Hopefully it'll turn out well for us.

Mosqueda: Okay Laura, thanks, do you think he's in his office to see if he can give me something right now?

Ramirez: I don't know, the truth is I haven't spoken to him since evening but let me send him a message and see if he is connected (online/avail).

Mosqueda: Thanks, Laura

Ramirez: He hasn't gotten back to me but once he responds I'll let you know

November 4, 2018

Mosqueda: Laura hi Chuy wants you to call him please.⁵

November 5, 2018

Mosqueda: Hi

⁵ I know from my training and experience that "Chuy" is sometimes used as slang for Jesus.

Ramirez: Hi

Mosqueda: What happened did he tell you anything

Ramirez: He's still seeing what's coming this week, I only have 1000 I don't know if they are going to order for more to be brought. How are things going for the things out of Chicago? Have you spoken to him?

Mosqueda: From the dress that I wanted, I haven't received anything and the rest I only received what you sent with your sister.

Ramirez: Have you crunched numbers with him?

Mosqueda: No yesterday, when I called/spoke to him, he told me that there would only be whatever you had....from the pick up....i'll call you when I cross.

Ramirez: ok let me know

Mosqueda: (thumbs up)

November 6, 2018

Mosqueda: Hey Laura, Chuy said that he told you yesterday to give me \$1000

Ramirez: so \$1000? I didn't understand anything he said. Okay, that's fine.

Mosqueda: yes, he just confirmed with me right now. We'll talk later.

Ramirez: ok perfect.

Mosqueda: (thumbs up)

November 11, 2018

Mosqueda: HI

Ramirez: Hi

Mosqueda: you called me?

Ramirez: Chuy wants to talk to you

Mosqueda: yes, I spoke to him yesterday

November 27, 2018

Mosqueda: HI laura

Ramirez: Hi

Mosqueda: how are you

Ramirez: good and you

Mosqueda: Listen, what's all this about there is going to be another person and who is it that we're going to deal with now? Fine/ well, too.

Ramirez: I honestly don't know they haven't told me anything and they haven't called me or anything but from what I understand it'll no longer be Chuy, that's all I know.

Mosqueda: That's doesn't sit well with me because he still owes me

Ramirez: I just started working 6 days a week because I don't know what's going to happen. Have you spoken to him?

Mosqueda: I know, they have us totally abandoned (cut off, out of the loop)

Ramirez: yes, that's the truth, I don't even know how to "move" (what to do, how to go about things)

Mosqueda: yes but he only tells me that how many pencils are left

Ramirez: I was in communication with one person for the customs crossing (la crusada de la aduana) but there's no way if there's no money. *sigh/ ugh.

Mosqueda: I know. But then how did you know about Chuy?

Ramirez: When he called me about giving you the money

Mosqueda: Oh, so he, himself, told you. And he hasn't said anything to me.

Ramirez: Well, that's what I understood. He hasn't told me anything more.

Mosqueda: And I keep taking out pencils and there's still more. Pencils and a lot/bunch of staples.

Ramirez: That's why I'm trying to get in touch with/ communicate with the one that crosses, but since I don't know him, I don't know if I can trust him. If you want, within the next few days, we can both call him and see. Because supposedly, he crosses only cars but maybe once there, he'll "buck up" and do it. all that is needed is the money

Mosqueda: Okay. We'll see when we can see each other so we can have a good/clear talk

Ramirez: whenever you'd like. I'm working only evenings right now

91. While analyzing phone records, agents located a common number (+52-341-112-7993) who has been in contact with RAMIREZ, Elias Cobian, and Oswaldo Cobian. Agents also observed the same number saved in Victor Cobian's cellphone as "Terregeras." Jesus Cisneros-Hernandez appears to have accidentally forwarded his entire contact list to Oswaldo Cobian. In that contact list, case agents located a number for "Terregeras" as 530-681-4995. Using a commonly-searched law enforcement database, case agents queried the number and found the number listed to Jose Cisneros-Hernandez, Sr. (DOB: 11/12/1982).

92. Jose Cisneros-Hernandez is a United States resident, who resides in Woodland, California. Agents were able to locate the following Facebook page “Jose Cisneros” (Facebook ID 100008242095444; URL: <https://www.facebook.com/profile.php?id=100008242095444>). Case agents compared the photos on the page for Facebook profile “Jose Cisneros” with the California Department of Motor Vehicles photograph of Cisneros-Hernandez, and the two appear consistent. Case agents reviewed the publicly available section of Facebook profile “Jose Cisneros” and found that the profile was “friends” with the previously-identified Facebook profile for Jesus Cisneros-Hernandez.

93. I have reviewed a conversation between the Facebook profile “Jose Cisneros” and the Facebook profile for “Juan Sevayos” on December 2, 2018. In that conversation, Jose Cisneros tells Sevayos that his Uncle Javo wants to talk to Sevayos. Sevayos responds in substance that he is driving with people in the car, implying that he cannot talk. On December 4, 2018, Sevayos asks Jose Cisneros the following, which has been summarized and translated from Spanish to English: “Don’t you have any friends in Las Vegas?” Jose Cisneros responds: “Only Felipe why? . . . well???” Sevayos responds in substance: “Talk to him. Tell him to get in touch with me. He knows. He has already acquired some. Tell him.” Based on my knowledge of the investigation, the reference to “Felipe,” and my training and experience, I believe that Sevayos and Cisneros are discussing the trafficking of firearms.

94. I also noted that Facebook profile “Jose Cisneros” “liked” a post from September 2017 titled “CJNG Corridos” on September 3, 2017.

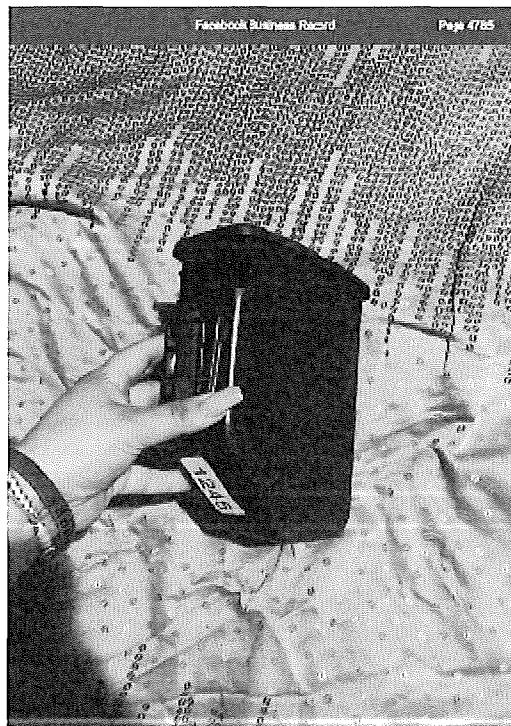
95. A toll records analysis shows that RAMIREZ was in contact with Jose Cisneros-Hernandez multiple times in July 2019, exchanging communications twice on July 3, 2019, once on July 4, 2019, and eight times on July 5, 2019.

FACEBOOK CONVERSATION: RAMIREZ & JARAMILLO GARCIA

96. Agents reviewed conversations between the Facebook profile “Laurita Ramirez” and Facebook profile “Jaramillo Garcia.” Agents are unaware of the identity of the individual controlling Facebook profile “Jaramillo Garcia.” The following conversations were viewed on RAMIREZ’s page:

November 7, 2018

[RAMIREZ sent the photograph below depicting a magazine commonly used in an M249S rifle]:



November 12, 2018

Garcia: Do you have any 45s?

Ramirez: I don't have any right now, fool. Who's looking (for one)?

Garcia: A mutual friend. It's urgent. For today. Cash.

Ramirez: Which mutual (friend)? I don't have one, fool. I have an AR.

Garcia: No fool, AR, no.

Ramirez: That's the only one I have, fool

Garcia: Not even a Petzi?

Ramirez: Tomorrow, I'll check what is there

Garcia: Okay, let me know.

Ramirez: For who, bitch?

Garcia: A mutual friend

Ramirez: Ok, yeah, I'll check the storage. Who's the mutual friend. Haha

Garcia: (unable to retrieve voice message)

Ramirez: Just curious, fool. Yes, tomorrow, I'll check in the morning

FACEBOOK CONVERSATION: RICHARD MOSQUEDA & JUAN TANKE

97. Case agents identified and reviewed several conversations discussing firearms between the Facebook profile "Richard P Mosqueda" and Facebook profile "Juan Tanke." MOSQUEDA has a prior felony conviction in the United States, but appears to live in Mexico currently. Agents have been unable to identify the individual controlling the Facebook profile "Juan Tanke," as he appears to be a Mexican citizen.

September 13, 2017

Mosqueda: I dont now I was tire and I took of

Tanke: Ah ok

Mosqueda: 50 cal bullet

Tanke: (Sends emojis)

Mosqueda: JaJaJa. I am going to make a pin

Tanke: Ill take one of those guns lol

Mosqueda: Shiiii thats to big

Mosqueda: That is what she set

September 23, 2017

Tanke: Yo how much does he sell the 40 glock for. And the 9?

Mosqueda: 1100. 1200 assembled⁶

⁶ Based on my training and experience, I know that it is common for smugglers for firearm

Tanke: But the ones we get for him belong to somebody or can people buy them off him? 9 is 1100 and 40 1200? I hear u but ill take the heat for it the people are legit and ur names aint gonna be involved brotha. Cool homie. I cant play the recordings

March 25, 2018

Tanke: Hey do u have a heater?

Mosqueda: Only the one you sold me

Tanke: Lol not that kind

Mosqueda: What kind

Tanke: Strap⁷

November 5, 2018

Tanke: Dude there here get over here

Tanke: Bro don't come over I don't want u to get in trouble but there here I'm stuck in my house

Mosqueda: Juan I em I san Diego

Tanke: Fuck nimodo let's see what happens

Mosqueda: Whats going on

Tanke: The bosses are here with the bataka

Mosqueda: What did you do

Tanke: I let someone take out the shotgun and they pulled it out

Mosqueda: What why did you do that for

Tanke: I messed up bro

Mosqueda: Fuk and what happened

Tanke: Nothing they told the boss now there here

Mosqueda: Hoo pulled it out on hoo and wy

Tanke: Bigotes on sanjo for bs

Mosqueda: And ware is bigotes

Tanke: He hasn't came out his house

Mosqueda: Why the fuck isint he backing you up. Thus he have the shit gun

Tanke: I have it no bullets

Mosqueda: And waht thauss the boss want

Tanke: Answers on why it happened I guess but idk what others said

smugglers to break down the weapons into smaller parts in order to get them across the border.

⁷ Based on my training and experience, I am aware that the street term "heater" and "strap" can be terms for a firearm.

Mosqueda: Try talking to him and fuck bigotes he should be their baking you up it his fuck up

Tanke: I know and I know they talked to him yesterday but he never came over to tell me what they said

Mosqueda: That's why he probably is saving his skin and letting you die alone

Mosqueda: You tell them what happened let him deal with them

Mosqueda: It's on him that you point the shot gun on them

Tanke: I know he pulled it out and he pointed it I just took it from him and brought it home after all that happened

Mosqueda: Tell them what went down. And what's been happening the boss doesn't want trouble there

April 14, 2019

Tanke: Yo. Hey call me thru messenger. Emergency. Where are you at. Hey were you at homie. Hey I need to get out of here. I'm outside I don't know where to hide. I can't go home. Help me brotha. You need to come for me brotha and strapped.⁸

FACEBOOK CONVERSATION: MOSQUEDA & IDALIA MOSQUEDA

98. Case agents reviewed conversations and photographs between the Facebook profile "Richard P Mosqueda" and Facebook profile "Idalia Mosqueda." Agents observed photographs and conversations that suggest the person controlling the Facebook profile "Idalia Mosqueda" may be MOSQUEDA's wife. The profile page for "Idalia Mosqueda" states the person resides in Tijuana, Baja California, Mexico.

99. The following conversations and photographs were sent between the two Facebook profiles by audio and text message. The messages have been summarized and translated from Spanish to English. The photographs below were sent on December 20, 2018, and depict a Heckler & Koch rifle, Model MR762A1, 7.62X51 caliber bearing serial number 242-000745. The serial number of the tan rifle could not be identified.

⁸ I am aware that the term "strapped" can refer to an individual possessing a firearm.

Photo Id: 353718365178497



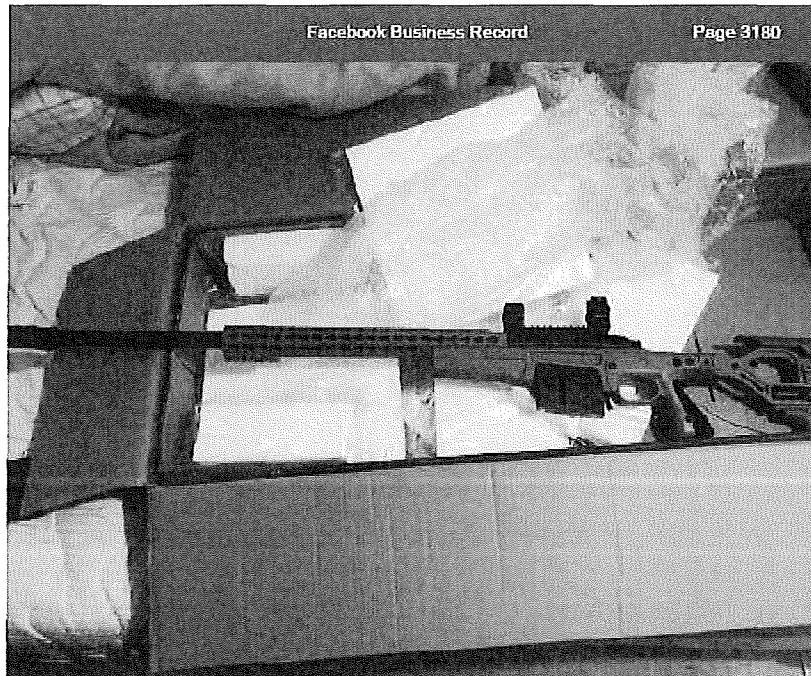


Photo Id: 577048522755399

November 25, 2018

Mosqueda: I have just woken up but there is a lot of police (presence) so I am going to leave in the morning. I am taking 2 "dresses."⁹

Idalia Mosqueda: Ok

Mosqueda: El Chato said that he'd have \$4,000 for me when I arrive

Idalia Mosqueda: Ok, love

Mosqueda: (sends sticker) El Conejon already told me

Idalia Mosqueda: He better....

Mosqueda: No, it's that I told him that wtf if I go am I going to get paid for this or not and he said that he had 4000 and I didn't understand him very well but I believe he said that he was going to pay so that I could take my family wherever I want.

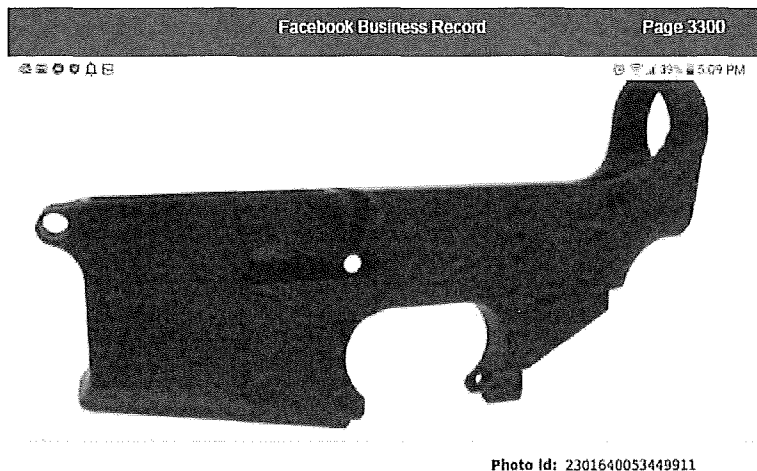
Idalia Mosqueda: That that was good what you told him

Mosqueda: Look at your WhatsApp

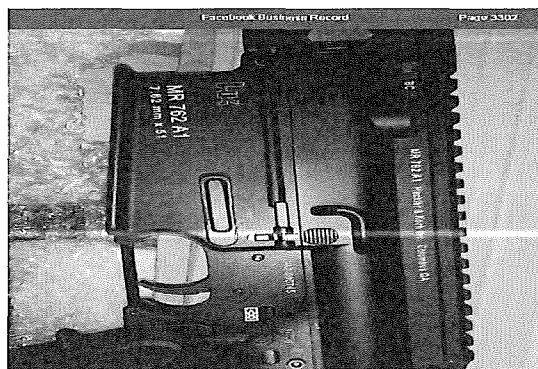
⁹ At the time of this message, the geolocation data for **MOSQUEDA**'s Facebook profile placed him in or around Las Vegas, Nevada.

FACEBOOK CONVERSATION: MOSQUEDA & TONY J PADUA

100. Case agents identified and reviewed conversations about firearms between the Facebook profiles “Richard P Mosqueda” and “Tony J Padua.” The two discuss the price of firearms accessories and send the following photographs to each other between April 19, 2019, and May 12, 2019. MOSQUEDA sent the following photo:



MOSQUEDA sent a photograph of the same Heckler & Koch rifle, Model MR762A1, 7.62X51 caliber bearing serial number 242-000745.



May 8, 2019

Padua: Last night it's went through

Mosqueda: Exelent primo send you the info on the other one in a bit

Padua: Are you coming over today

Mosqueda: No I remember I told you I had to sen some thing thas wha I em duing now cuss

Padua: What did you do

Mosqueda: Primo can you look clips for this one

Padua: Yeah

FACEBOOK CONVERSATION: MOSQUEDA & ARMANDO CHAVEZ

101. Case agents identified and reviewed conversations about firearms trafficking between Facebook profiles “Richard P Mosqueda” and “Armando Chavez” between January 26, 2019, and January 30, 2019. The conversation has been summarized and translated from Spanish to English below.

January 26, 2019

Mosqueda: Well, I spend more time in Chula Vista than here. I have to hustle/work. I have my car wash now.

Chavez: Nice!

Mosqueda: Yeah, well, that’s the only way... now I come home 1-2 times. I spend my time in Chula Vista

Chavez: Nice! (way to go, badass, etc)

Mosqueda: It’s a real pain having to cross daily

Chavez: That’s true, plus the size of the lines that form. And how are things going at the carwash?

Mosqueda: Well, Victor goes there and he did me a solid, he’s in a car club and another trucker compa also has a shit-ton of compas

Chavez: nice! So then you have lots of people (you’re saturated)

Mosqueda: I stay busy with that. Hey, the Glocks are there, I’ll give you a good price

Chavez: Which ones? You have them there?

Mosqueda: Assembled or disassembled? No, in tijuas (Tijuana) but I can buy and assemble whichever ones you want

Chavez: For how much?

Mosqueda: the 40, 19, 26, and 43

Chavez: For how much?

Mosqueda: Do you want them assembled, disassembled in TJ or San Isidro? In TJ and assembled 1100 for you. Disassembled 900. In Isidro, 850 and disassembled in Isidro 800 but (only if buying) 5 or more. Under 5 then add 100 ("TJ" refers to Tijuana, Mexico and "San Isidro" refers to San Ysidro, California)

Chavez: hahaha. You're trying to sell pineapples to a pineapple farmer/grower

Mosqueda: No, my Chavo, the thing is that you're not going to get them any cheaper yo're going to pay for the jump (crossing them over) and the goat (smuggler) and the waste of time. Do the math and you'll see

January 27, 2019

Chavez: hahaha. If you knew that I know of another place close by, a bit cheaper and with magazines of 15

Mosqueda: oh, well, that's good. They give me a 15% discount. ???? And soon they'll give me the dealer's price ('wholesale'). ??????

January 28, 2019

Chavez: are you at it?

Mosqueda: we're here

Chavez: How you doing?

Mosqueda: What's up/what happened?

Chavez: Hey, I heard that you had a loss there at the warehouse. That they blamed you for a few things.

Mosqueda: that's right.

Chavez: Yeah, I heard. They wanted to take you

Mosqueda: they did take me

Chavez: Really

Mosqueda: But being armed and they shot me twice but the asshole that fired was crazy/all over the place, a real dumbass because he wasn't successful/ his shots failed. I dropped my firearm and jumped on him.

Chavez: Holy shit. Now you know why I got out because I noticed the thing was getting bad

Mosqueda: He wanted to hit my firearm and he messed up and went screaming like a bitch when he couldn't take me (down).

Chavez: Yeah, I heard but not about that part.

Mosqueda: They were looking for me everywhere but I'm too good for that business.

Chavez: I know. As a matter of fact, they asked me where you lived and I sent them packing. I told them that and then they jumped me. I told them it's not my business anymore (I don't give a shit) what you do or what happens to you all.

Mosqueda: Thank God we're still here but they won't catch me unprepared again.

Chavez: Fuck that. That's what I told the uncle that you were an old wolf.

Mosqueda: I have a little surprise for them if they decide to go looking for me

Chavez: I don't think they will anymore. Right now someone's got beef with me. They also asked me about the other person but I sent them packing. You can guess/imagine who.

Mosqueda: Besides, I asked a little favor of some old friends if something happens to me, they know where to go and with who.

Chavez: fuck

Mosqueda: Yeah, I know.

Chavez: They keep coming to me (as in to bring him back to the scheme) and I keep sending them packing. I tell them that no, I'm good/comfortable not dealing with that shit.

Mosqueda: Some special forces compas and some bikers that I've known for 25yrs. Schoolmates whose lives I have saved. They must think that I'm some asshole.

Chavez: Now you see why I left without a chance to tell you. I only knew that you were there with Gera. I said fuck it.

Mosqueda: They don't know that I know explosives and other surprises that I have prepared.

Chavez: Gera couldn't handle my tusk/horn.

Mosqueda: Besides that, I spend more time here in Chula Vista

Chavez: He tried to fuck me over too. He saw me as a jackass but he got fucked over by my tusk.

Mosqueda: the thing is that things have changed a lot. I told them I'm old school.

Chavez: Gera is really shady

Mosqueda: I'm straight-forward and I follow a code. To date, they don't even trust themselves.

Chavez: That was the thing/problem for everyone.

Mosqueda: Everyone fucks everyone over. Not me, earning enough, I'm happy that's why I've lasted so long.

Chavez: Yeah, but he would cross the line.

Mosqueda: And that's why I have friends in the (misspells "adecuados) places. Sorry, adequate/ right places.

Chavez: Same. That's why I have good friends. There's a certain limit of tolerance that one can work with. You remember the one that we used to knock over/fuck with (60%). A few coins but without bullshit.

Mosqueda: That's right. For example, Victor is going to give my daughter classes for free.

Chavez: Right. That's awesome. The point is that you fought well. They found out and fucked me up and in fact, wanted to put the blame on me.

Mosqueda: The complete course. Yeah, she asked him if someone of her age could do it and he said yes that I would have to go with her and told her that he wouldn't charge her one cent.

Chavez Nice!

Mosqueda: Well, take care of yourself. I don't trust anyone/thing. I'm fed up and made plans if anything happens. Besides, I wanted to talk to the boss man ("el mero patro") I have proof that I didn't get anything in writing.

Chavez: I have Chinungas (Chindu's) number

Mosqueda: From the message that he sent me, the one he delivered

Chavez: Want me to ask him if I can give it to you?

Mosqueda: Well, talk to him and ask him if I can talk to him to clear things up. Besides, they still owe me \$40,000

Chavez: \$60,000 dollars to me

Mosqueda: Get the fuck outta here

Chavez: Yes, Gera. Well, just say the word if you want we can sell one or two but the most they'll buy them for is \$1,000 dollars.

January 29, 2019

Mosqueda: Are you alone now? I need to talk to Chinungas (Chindu) as soon as possible.

Chavez: He hasn't answered/replied.

Mosqueda: OK

FACEBOOK CONVERSATION: MOSQUEDA & ESELE ROJO DELOSDIABLOS

102. Case agents observed photographs and conversations related to firearms trafficking between the Facebook profiles "Richard P Mosqueda" and "Esele Rojo Delosdiablos." The photographs sent between the two appear below, and the conversations have been translated from Spanish to English.

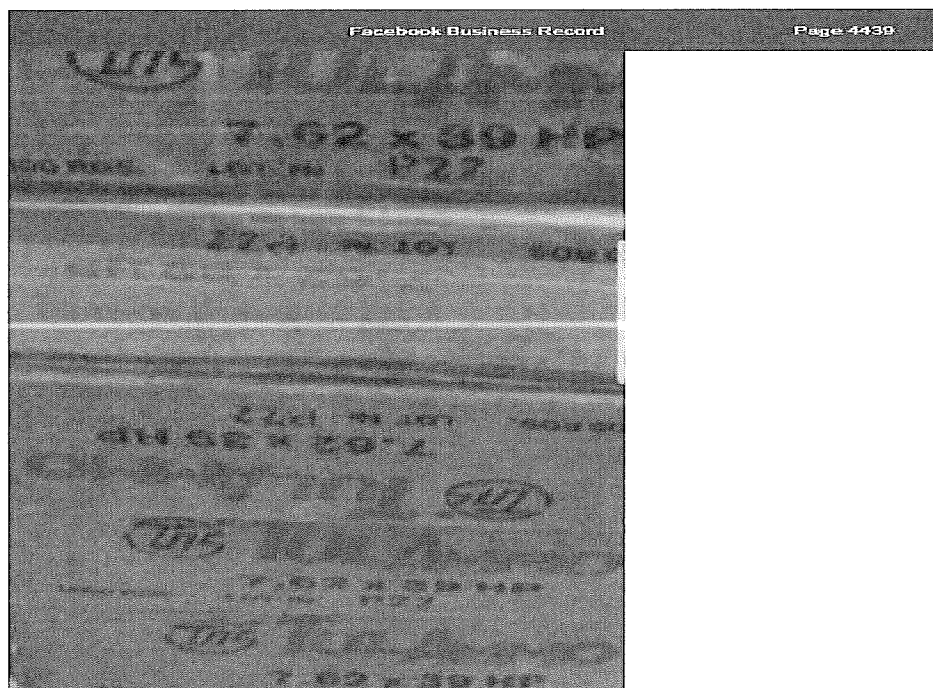
March 25, 2018

On March 25, 2018, Mosqueda sent a photograph depicting a rifle barrel:



December 14, 2018

On December 14, 2018, MOSQUEDA sent the following photo depicting 7.62x39 boxes of firearm ammunition:



March 31, 2018

Mosqueda: Good evening. I'm back. I forgot to tell you that the nine 9mm 380 \$640 and the magazine costs \$30 so that you can tell Gera next month. He is going to go there with you guys and Vic told me that he would separate the ones we wanted and that he'd give us priority.

Delosdiablos: okay, perfect. Listen.....

Mosqueda: what's up?

Delosdiablos: Block Turi (Ju Ar Char) from everything. Gera gave me the indication that we should do it because they are looking/finding him for what they're accusing him of. Ok. Block him. Please.

Mosqueda: done. How are you

Delosdiablos: good thanks. Here at home. I didn't go out. I won't go out until next week, we'll see what's up

Mosqueda: ok. I've erased it completely.

Delosdiablos: perfect. We'll be in touch my Richard. Take care of yourself. God bless you and greetings to your family. We'll be in touch, you know.

April 17, 2018

Mosqueda: Good day, sorry I go to bed early. I leave for the U.S. at 2am.

Delosdiablos: don't worry about it. Good morning.

Mosqueda: good morning. You didn't call me yesterday.

Delosdiablos: No just message.

Mosqueda: And are we going to talk to Gera

Delosdiablos: last night, I was coming from there so I talked to him. He told me to go. I already talked to him. He was stalled but we got it going again. He told me that today there'll be money

Mosqueda: What happened? Oh, well, that's good news.

Delosdiablos: Yes

Mosqueda: I want to "work" already.

Delosdiablos: me too. I don't have money

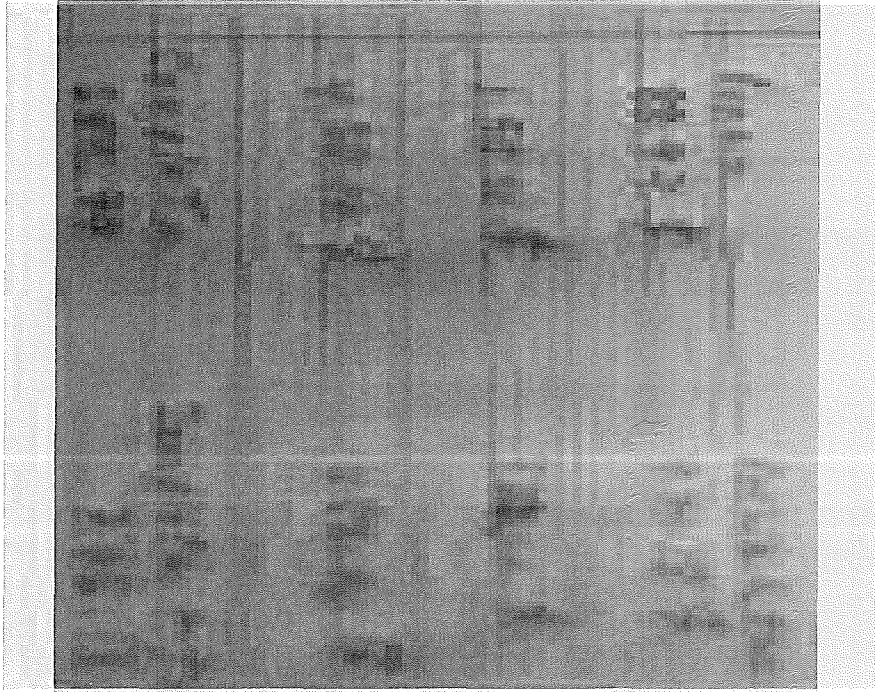
Mosqueda: I'm really low on funds and I need some things to start up my car wash

Delosdiablos: I'll give you what I had hwen I can Richard. Don't worry about it.

Mosqueda: yes, don't worry about it. We'll get it figured out.

Delosdiablos: did you try again? 6195537681. 552

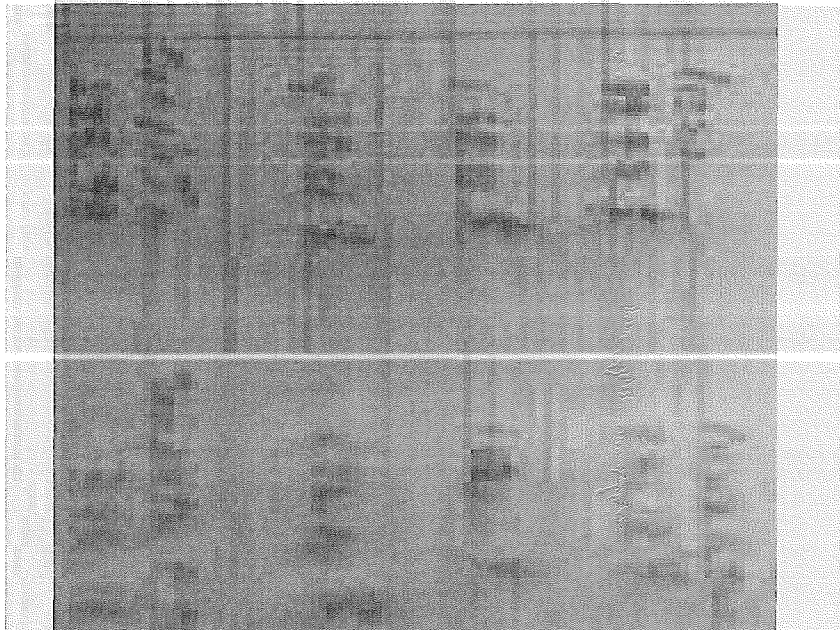
Mosqueda: yes. (sends screenshot below that appears to be a price sheet) Sorry for the delay. Here are the prices you asked for. I don't have prices for the 380s. the ones I had I gave to you to give to Gera. The next time I go to the store I'll bring you prices.



Delosdiablos: sounds good.

Mosqueda: (thumbs up emoji)

Delosdiablos: (sends screenshot below that appears to be a price sheet) which is which?



Mosqueda: the left side is without tax, right side is with tax

Delosdiablos: oh okay. Same cost

April 27, 2018

Mosqueda: Not yet? My cell is almost due/out and I wont have money to pay it. I hope a job comes up. You know, I'm going to try to communicate with Laura to go and talk to Gera. This is just too much and I want to know if there isn't going to be any more work in order to find another way. I'll let you know so that you don't think I'm jumping over people. I'll let you know what happens.

Delosdiablos: Laura is working with him. Nothing will be resolved. But do what you want, it's obvious you don't believe me.¹⁰

Mosqueda: well then lets go together and talk to him to see what's going on

Delosdiablos: Laura called me. Call me. I'll tell you.

Mosqueda: okay. It goes to voicemail.

Delosdiablos: I don't understand why. I have it in my hand.

Mosqueda: it rings but it goes to voicemail.

103. Case agents also reviewed communications between Facebook profiles "Jesus Cisneros," the profile for Jesus Cisneros-Hernandez, and "Ju Ar Char." Case agents located a conversation in Spanish on or about January 24, 2019, in which Cisneros asks for a photo of "Laura's sister." Cisneros says in substance: "Help me recover that mini-me and I'll gift/give it to you and I'll give you more money. Mituri." I know based on my training and experience that "mini-me" is slang for an FN Minimi 5.56 Squad Automatic Weapon (SAW) firearm. "Ju Ar Char" asks for clarification: "Which one, the one Laura delivered or the one the uncle hasn't delivered. What I can help you with is with Laura. I can locate her." Case agents believe that they are referencing RAMIREZ, because "Ju Ar Char" later says: "By the way, the chubby girl that was with el Gera, the one with the Jeep, I know sort of where Laura lives. In San Diego. I don't know it (address) only more or less. It's been a long time since I have gone. She lives on/around Palm. But you can find her at the Little Caesars on Palm, she works there. Well, now they are blaming the other." Case agents know that RAMIREZ drives a Jeep and previously worked at a

Little Caesars, located at 4370 Palm Avenue in San Diego, California. Cisneros again states that “[t]hey stole two mini-mes and aside from the one the uncle hasn’t delivered.”

104. For several reasons, case agents believe that SOI-1 is reliable and credible. First, SOI-1 has been providing continuous information since March 2019. Second, the information provided by SOI-1 is consistent with evidence obtained elsewhere in this investigation where SOI-1 was not utilized, and substantial parts of SOI-1’s information has been corroborated through independent investigation, including surveillance, electronic evidence, documentary evidence, and information from other sources. Third, the SOI-1 has made statements to case agents that are against his/her penal interests, in that the SOI-1 has admitted his/her involvement in the illegal trafficking of firearms. SOI-1 is providing information for consideration pursuant to a federal proffer agreement related to this criminal matter. I am not aware of any criminal convictions for SOI-1. Finally, the SOI-1 has had an adequate opportunity to observe directly the events discussed and/or has heard conversations directly from the individuals discussed herein.

RESIDENTIAL SEARCH WARRANT EXECUTED IN CHULA VISTA, CA

105. On September 23, 2019 ATF agents obtained federal search warrants for residences associated with Richard P MOSQEUDA (355 Guava Ave, Chula Vista, CA) and Laura RAMIREZ (256 E Quintard St, Chula Vista, CA). The warrants were signed by the Honorable Judge Gossett. On September 24, 2019, agents executed the aforementioned search warrants.

106. At 355 Guava Ave, Chula Vista, CA, agents encountered Antonio PADUA (H/M, DOB: 08/18/1982). During an interview with agents, PADUA claimed to be a cousin of

¹⁰ Agents suspect that the “Laura” mentioned in the conversation is **RAMIREZ**.

MOSQUEDA. Additionally, PADUA advised he was aware MOSQUEDA was taking firearms into Mexico. Agents located several cell phones, and computers which are expected to contain evidence of the scheme. Lastly, agents located an empty handgun box. Agents are aware since the search warrant, MOSQUEDA has been observed by law enforcement at the residence. Agents suspect MOSQUEDA is aware a search warrant was executed due to his involvement in the firearms trafficking scheme. Agents wish to search the contents of MOSQUEDA's Facebook page for additional information that may be contained within the contents of the page since the search warrant at 355 Guava Ave, Chula Vista, CA.

107. Agents additionally executed a warrant at 256 E. Quintard St, Chula Vista, CA, simultaneously to the aforementioned residential warrant. Located in the residence was Laura RAMIREZ. During a non-custodial, mirandized interview with agents, RAMIREZ admitted to her role in the firearms trafficking scheme. RAMIREZ advised the scheme was controlled by Jesus CISNEROS-HERNANDEZ. Under Jesus CISNEROS-HERNANDEZ was Juan A. CHARLES. RAMIREZ advised she received instructions and orders from the two individuals for firearm pickups and firearm/accessory orders. RAMIREZ advised she picked up firearms from the Los Angeles, CA, area and from Las Vegas, NV. RAMIREZ would transport the firearms to the San Diego area and provide all firearms to MOSQUEDA.

108. RAMIREZ stated CISNEROS-HERNANDEZ asked her to marry him so he could obtain United States Citizenship. At this point, RAMIREZ removed herself from the trafficking operation. RAMIREZ advised she was aware CISNEROS-HERNANDEZ associated with CJNG. RAMIREZ advised she had a feeling the firearms were being provided to CJNG. RAMIREZ stated once the firearms were smuggled across the border, they were stored at an individual's clothing store named "Gera". RAMIREZ stated she believed this person's real name was Gerardo

Delgado Cobian. RAMIREZ advised an individual she knew as “Chato” would assist MOSQUEDA transport firearms to “Gera’s” store. RAMIREZ did not know this individual’s name but provided his Facebook page to agents. This page had the username “Francisco Javier Robles”. RAMIREZ advised “Chato” drove a Taxi in Tijuana and assisted MOSQUEDA. Additionally, RAMIREZ provided the phone number +52 1 664-751-3549 as a contact number she had for “Chato”.

109. RAMIREZ stated in January 2019, CISNEROS-HERNANDEZ and CHARLES accused her of stealing firearms. RAMIREZ stated she provided the firearms in question to a “Chola” (street term for female gang member) she only knew as “Estrella”. RAMIREZ stated “Estrella” was supposed to take the firearms into Mexico and provide them to CISNEROS-HERNANDEZ. RAMIREZ stated when the firearms did not arrive as planned, CISNEROS-HERNANDEZ blamed RAMIREZ for the theft. RAMIREZ advised she told CISNEROS-HERNANDEZ and CHARLES where she worked so they would not involve her family. Agents provided a state of California booking photograph of Estrella C ESCALANTE (H/F, DOB: 09/14/1992) to RAMIREZ. RAMIREZ indicated this was the female who she provided the firearms. RAMIREZ located and identified the Facebook page “Estrella Ele” for a page associated with the female she knew as “Estrella” and provided the information to agents. Agents compared the booking photograph of ESCALANTE to the photographs on the aforementioned Facebook page and the two appear consistent.

110. Additionally, RAMIREZ confirmed a utilized Facebook page for CISNEROS-HERNANDEZ was “Pedro Gonzalez”. RAMIREZ stated she only knew this page to be utilized by CISNEROS-HERNANDEZ. Agents observed the Facebook page “Pedro Gonzalez” was Facebook friends with the page “Elias Cobian” and “Francisco Javier Robles”. RAMIREZ stated

CISNEROS-HERNANDEZ mainly communicated with her via WhatsApp and would carry two cell phone at all times.

111. RAMIREZ advised she obtained firearms from a Hispanic male in the Los Angeles area. RAMIREZ did not know this individuals name however she observed the Facebook page “Felipe Alvarez” and indicated the photos of the man on the page appeared to be the man she met in Los Angeles. RAMIREZ stated she thought this individual was from Nevada. It should be noted when CISNEROS-HERNANDEZ sent his contact list to Oswaldo COBIAN, there were two contacts within the list with the name “Felipe” (702-883-2647) and “Felipe 1” (725-300-7295). Additionally, agents queried the Facebook page “Felipe Alvarez” and observed the page was Facebook friends with the page “Pedro Gonzalez”, “Elias Cobian”, “Jesus Cisneros”, and “Oswaldo Cobian”.

112. Agents believe RAMIREZ is credible for multiple reasons. RAMIREZ has not been arrested as an adult in her lifetime and has no criminal history. Additionally, all statements made above by RAMIREZ were made against her own interest. RAMIREZ admitted to her role in the firearms trafficking scheme and confirmed details agents already previously knew about co-conspirators (CISNEROS-HERNANDEZ/CHARLES/MOSQUEDA). Since RAMIREZ interview, she has provided information to ATF agents in San Diego regarding criminal activity.

IDENTIFICATION OF MARCO SANTILLAN

113. Agents identified Marco A SANTILLAN Sr. as an individual connected to the CISNEROS-HERNANDEZ trafficking scheme. SANTILLAN is a convicted felon based on a California case which was disposed on 3-25-2005 for Receive/Etc Known Stolen Property. On or about 8/7/2019, SANTILLAN ordered a M134 Mini Gun Parts Set at a retail price of \$40,000 from James Coots located in Clinton, OH. SANTILLAN listed his address of 12904 Foxley Dr,

Whittier, CA, 90602, but shipped the parts to McCulloch Boulevard N #2046, Lake Havasu City, AZ, 86403. Though this kit is not considered a firearm by federal definition, the kit is typically sold missing a receiver. Once a receiver is completed with the kit, a fully functioning Minni-gun can shoot between 2,000 and 6,000 7.62X51 caliber rounds per minute. Rough estimates suggest that one minute of firing a .308 caliber round through a Mini-gun would cost the user approximately \$860.

114. On or about 8/20/2019, SANTILLAN sent \$4685.00 to the owner of Crane Technologies located in Waukesha, WI. SANTILLAN went on to purchase a M124 Mini Gun kit, model 1005-921-6241 for approximately \$38,000.00. As stated in paragraph 165, these items are not firearms but can be completed into fully functioning firearms. Additionally, agents were able to identify SANTILLAN's wife as Elizabeth SANTILLAN. On 9/12/2019, Elizabeth SANTILLAN purchased eighty (80) RPD rifle 100 rounds drum magazines. Elizabeth SANTILLAN inquired about ordering five hundred (500) magazines but only purchased eighty (80). Elizabeth SANTILLAN's order total was \$3,196.00. Elizabeth SANTILLAN provided the number 424-221-2057 for this order.

115. Agents are aware that Marco/Elizabeth SANTILLAN was in contact with Francisco Javier Robles AKA "Chato" 1 time on 10/26/19. The phone number utilized by Marco/Elizabeth SANTILLAN was 424-221-2057. The number used by "Chato" was 52 1 664-751-3549 which RAMIREZ provided to agents in her statement. Agents suspect that Marco SANTILLAN is engaged in firearms trafficking between the United States and Mexico. Given his purchases and contact with "Chato" it appears Marco SANTILLAN is participating in the scheme.

116. Agents queried Facebook and located a profile listed as “Marco Santillan”, URL: <https://www.facebook.com/marco.santillan.148>, Facebook ID: 100001767077996. Agents reviewed photographs on the publicly viewable portion of the page. Agents compared the photo on the page with a California DOT photo of Marco SANTILLAN and the two appear consistent.

IDENTIFICATION OF FACEBOOK PAGES

117. ATF agents queried Facebook and found a profile listed as “Oscar Cobian”, URL: <https://www.facebook.com/oscar.cobian.923>, Facebook ID: 100000739694551. Although, no photographs were publically viewable the profile listed a hometown as Oak Creek WI. This Facebook page listed “Friends” with the known profiles for Oswaldo Cobian. The profile was also “Friends” with “Arte Cobian”. ATF agents know that “Arte” is short for Artemisa. According to the Illinois Secretary of State website, Artemisa Cobian is the agent for Cobian Utility Contractors in Chicago, Illinois. Oscar Cobian is listed as the LLC manager for this company. The profile also listed its likes as Victor’s Again bar in Oak Creek, WI.

118. ATF agents queried Facebook and found a profile listed as “Pat Finnell,” Facebook ID number for the profile is 100005250308551, and a corresponding URL of <https://www.facebook.com/pat.finnell.10>. The Wisconsin Department of Transportation (WIDOT) photograph of Patrick Finnell, Jr. was compared to the posted photographs on the publicly viewable portion of the Facebook page, and they appeared consistent. This Facebook page showed listed “Friends” with the known Facebook profiles for Oswaldo Cobian and Elias Cobian.

119. ATF agents queried Facebook and found a profile listed as “Elias Cobian”, URL: <https://www.facebook.com/elias.cobian.10>, Facebook ID: 100003360892625. The Wisconsin Department of Transportation (WIDOT) photograph of Elias Cobian was compared to the posted

photographs on the publicly viewable portion of the Facebook page, and they appeared consistent. Additionally, agents saw a picture of Chevrolet Silverado Truck with Wisconsin License Plate AG4081. This is the same vehicle in which Elias Cobian and Rafael Preciado crossed the U.S.-Mexican border.

120. ATF agents queried Facebook and found a profile listed as “Oswaldo Cobian”, URL: <https://www.facebook.com/oswaldo.cobian.3>, Facebook ID: 100000952930252. The Wisconsin Department of Transportation (WIDOT) photograph of Oswaldo Cobian was compared to the posted photographs on the publicly viewable portion of the Facebook page, and they appeared consistent. Additionally, there is a publicly viewable photograph of Oswaldo and Victor Cobian.

121. ATF agents queried Facebook and found a profile listed as “Rafael Preciado”, URL: <https://www.facebook.com/rafael.preciado.77310>, Facebook ID: 100013469521981. The Wisconsin Department of Transportation (WIDOT) photograph of Rafael Preciado was compared to the posted photographs on the publicly viewable portion of the Facebook page, and they appeared consistent.

122. ATF agents queried Facebook and found a profile listed as “Cristina Cobian-Michels”, URL: <https://www.facebook.com/cristina.cole.52>, and Facebook ID: 100001691233512. The Wisconsin Department of Transportation (WIDOT) photograph of Cristina Cole was compared to the posted photographs on the publicly viewable portion of the Facebook page, and they appeared consistent. This Facebook page showed listed “Friends” with the known Facebook profiles for Oswaldo Cobian and Elias Cobian. Cole also posted advertisements for Victor’s Again bar in Oak Creek, WI. ATF agents know that this bar is owned and operated by Maria Cobian, the mother of Oswaldo Cobian and Victor Cobian.

123. Agents located two Facebook pages for “Jesus Cisneros” with the following identifying characteristics: <https://www.facebook.com/profile.php?id=100033552382966>, Facebook user ID: 100033552382966, username Jesus Cisneros. Agents displayed the profile picture to SOI-1 who stated that it resembled CISNEROS, but the picture only showed the bottom three quarters of CISNEROS’ face. Agents queried the publicly viewable portion friends section for the page “Jesus Cisneros.” Agents discovered that on the Facebook page of “Jesus Cisneros,” it showed that he was friends with the following Facebook profile: “Elias Cobian.” The page also contained several Friends with the last name “Preciado” and “Cobian.” Several of the friends located on the page listed their hometown as Tonaya, Mexico, which is where SOI-1 met CISNEROS in December 2017. ATF agents received the Facebook communications of Laura Y. RAMIREZ pursuant to a Federal search warrant signed by United States Magistrate Judge David Jones on April 26, 2019. Affiant observed RAMIREZ was previously “Facebook Friends” with profile “Jesus Cisneros”, ID# 100032353987887, and URL: www.facebook/profile.php?id=100032353987887. A review of the above profile for “Jesus Cisneros” did not have a profile photograph visible. However, it did have common “Facebook Friends” with the other Facebook profiles associated with Jesus “Chindu” CISNEROS, and it is believed to be an additional Facebook page for CISNEROS.

124. Agents located a Facebook page for “Jesus Cisneros Hernandez” with the identifying characteristics: <https://www.facebook.com/jesus.cisneroshernandez.528>, Facebook ID: 100011433766434, username Jesus Cisneros Hernandez. This is believed to be a second Facebook page for CISNEROS. Agents displayed a picture from this Facebook page to SOI-1 who stated that it was CISNEROS. Agents queried the publicly viewable portion friends section for the page “Jesus Cisneros Hernandez.” Agents discovered that on the Facebook page of “Jesus

Cisneros Hernandez,” it showed that he was friends with the following Facebook profile: “Elias Cobian.” The page also contained several Friends with the last name “Preciado,” and “Cobian”. Several of the friends located on the page listed their hometown as Tonaya, MX.

125. Agents located a Facebook page suspected of belonging to ZORIC with the following identifying characteristics: <https://www.facebook.com/dejan.zoric.35>, Facebook User ID: 100001639880494, username Dejan Zoric. Agents queried friends of the Facebook page for “Dejan Zoric” and located the following individuals, “Oscar Cobian” and “Victor Maria Cobian.” Agents compared the photos displayed on the publicly viewable portion of the page “Dejan Zoric” to the Nevada DOT photo of ZORIC, the two appear consistent. Agents displayed a state of Nevada Department of Transportation (DOT) driver’s license photo of ZORIC to SOI-1. SOI-1 stated that the person in the photograph looked like ZORIC if he did not have hair. SOI-1 advised he only briefly met ZORIC on the two occasions.

126. Agents located the following Facebook page for RAMIREZ with the following characteristics: <https://www.facebook.com/l.y.rmrz>, Facebook ID: 100001107718926, username Laura Yahaira. Agents located a Facebook page with the name “Laurita Yahaira.” Agents know that RAMIREZ’s middle name is YAHAIRA. Your affiant displayed a photograph of the publicly viewable profile picture of the page “Laurita Yahaira” to SOI-1, SOI-1 stated the person in the photo appeared to be RAMIREZ. Agents compared the photo from the page “Laurita Yahaira” to CA DMV photo of RAMIREZ and the two appear consistent. The photograph on the Facebook page “Laurita Yahaira” depicts RAMIREZ sitting in a Jeep. ATF agents from the San Diego Field Office drove by RAMIREZ address on 04/05/2019. In the driveway of 256 E. Quintard St, Chula Vista, CA, was a 2006 Jeep bearing CA license plate 6MHJ590. That vehicle lists to RAMIREZ at the aforementioned address. Subsequently, RAMIREZ had crossed the

U.S/Mexican border on two occasions in that vehicle within the last eighteen (18) months.

127. ATF agents received the Facebook communications of Laura Y. RAMIREZ pursuant to a Federal search warrant signed by United States Magistrate Judge David Jones on April 26, 2019. Affiant observed RAMIREZ was previously "Facebook Friends" with profile "Jesus Cisneros", ID# 100032353987887, and URL: www.facebook/profile.php?id=100032353987887. A review of the above profile for "Jesus Cisneros" did not have a profile photograph visible. However, it did have common "Facebook Friends" with the other Facebook profiles associated with Jesus "Chindu" CISNEROS. Agents also viewed a conversation between RAMIREZ and Facebook username "Richard P Mosqueda", ID #100004091722706 and URL www.facebook.com/richardp.mosqueda. The conversation appeared consistent with subjects engaged in the illegal smuggling of goods into Mexico from the United States on behalf of a third party or organization.

128. Agents located the following Facebook pages related to TRGOVCEVIC: <https://www.facebook.com/boris.trgovcevic>, Facebook ID: 1231635895, username Boris Trgovcevic and <https://www.facebook.com/boris.trgovcevic.7>, Facebook ID: 100005774984427, username Boris Trg. Agents were able to locate the TRGOVCEVIC's two Facebook pages via ZORIC's Facebook page. ZORIC's Facebook page was friends with the TRGOVCEVIC's two Facebook pages. Also, located within TRGOVCEVIC's cellphone were Facebook messages from 2/19/2019 from ZORIC's Facebook page. Agents compared a Nevada DMV photo of TRGOVCEVIC to the photos on the aforementioned Facebook pages, and the photo of TRGOVCEVIC was consistent with photos of the individual displayed in photos on the two Facebook pages.

129. Agents located the profile page "Ulises Paz Garcia", ID# 100004234776037,

and URL: <https://www.facebook.com/ulises.pazgarcia.9>. A review of the profile picture for the page reflects the exact same photo of the Hispanic male depicted under the contact name "Uli La Bota" in Victor COBIAN's cell phone. Based on that photo, agents suspect the individual behind the contact "Uli La Bota" is the same individual operating the Facebook page "Ulises Paz Garcia". Agents reviewed the page's friends list and observed the page "Ulises Paz Garcia" was friends with pages "Elias Cobian" and "Cristina Cobian-Michel". The page "Cristina Cobian-Michel" has been linked to Cristina COLE, the person who bought a black FN SCAR rifle on 09/30/18.

130. Agents were able to locate the following Facebook page "Jose Cisneros",
FacebookID # 100008242095444, URL:
<https://www.facebook.com/profile.php?id=100008242095444>. Agents observed photos from the
aforementioned Facebook page and compared them to CA driver's license photo of Jose
CISNEROS-HERNANDEZ and the two appear consistent. Agents queried the friend portion of
the Facebook page and noticed the page was friends with a previously identified Facebook page
for Jesus CISNEROS-HERNANDEZ listed as "Jesus Cisneros".

131. Agents were able to locate the following Facebook page "Ju Ar Char", Facebook
ID# 566214795 and a URL of <https://www.facebook.com/juan.a.charles>. Agents observed
several photographs of a Hispanic male on the public portion of the Facebook page. Agents
developed a person behind the profile page as Juan A CHARLES (W/M, DOB: 05/05/1988).
Agents compared CHARLES California Department of Motor Vehicle photo to the photos on the
aforementioned page and the two are consistent.

132. Agents were able to locate the following page "Juan Tanke", Facebook ID#
100005962330826 and a URL of <https://www.facebook.com/juan.tanke.7>. The page depicts a

Hispanic male with the individual residing in Tijuana, Baja California, Mexico. During several conversations between “Juan Tanke” and MOSQUEDA the two refer to each other as “primo” or cousin. “Juan Tanke” appears to have knowledge of the firearms trafficking related to MOSQUEDA.

133. Agents located the following page associated with what appears to be MOSQUEDA’s wife. Facebook username “Idalia Mosqueda” with a Facebook ID# of 100001326680234 and a URL of <https://www.facebook.com/idalia.garcia.984>. MOSQUEDA and the page “Idalia Mosqueda” sent multiple voice memos to each other related to his trips to Las Vegas, NV. The two also exchanged photographs of several firearms. The profile page “Idalia Mosqueda” states the person resides in Tijuana, Baja California, Mexico.

134. Agents identified the following Facebook username “ Jaramillo Garcia”, Facebook ID# 100011641510518 and a URL of <https://www.facebook.com/t1Ero>. The page depicts a Hispanic male in multiple photographs. The person behind the page requested firearms from Laura RAMIREZ.

135. Agents identified the following Facebook page ““Tony J Padua”, Facebook ID# 1410197201 and a URL of <https://www.facebook.com/tony.j.padua>. The person behind the page “Tony J Padua” claims to be somehow related to MOSQUEDA. The person claimed to have attended Montgomery High School, located in San Diego, CA. The page “Tony J Padua” and MOSQUEDA trade pictures of firearms and “Tony J Padua” had access to MOSQUEDA’s Chula Vista address.

136. Agents identified the following Facebook page “Rudi Guzman”, Facebook ID#100010926572694 with a URL of <https://www.facebook.com/rudi.guzman.52>. The page depicts a Hispanic male with a location of Periquillo, Colima, Mexico. MOSQUEDA sent

photographs of two Glock handguns to the individual operating this Facebook page.

137. Agents identified the following Facebook page “Esele Rojo Delosdiablos”, Facebook ID#100013232921534 with a URL of <https://www.facebook.com/eserojo.delosdiablos>. The individual behind this page has multiple conversation with MOSQUEDA related to the trafficking of firearms across the United States/Mexican border. They also discuss working for a person named “Gera”, agent’s suspect “Gera” is the organizer of the firearms trafficking operation on the Mexican side of the border.

138. Agents identified the following Facebook page “Armando Chavez”, Facebook ID# 100025202857140 with a URL of <https://www.facebook.com/profile.php?id=100025202857140>. The page “Armando Chavez” and MOSQUEDA discuss trafficking firearms and being owed money for their involvement in the scheme. Agents have not identified the person behind the profile “Armando Chavez” but believe he resides in or around Los Angeles, CA.

139. Agents identified the following Facebook page “Francisco Morfin”, Facebook ID#100003687377019 with a URL of <https://www.facebook.com/pancho.viveros.7>. The page discusses the need and acquisition of a smuggle with Jesus CISNEROS-HERNANDEZ. CISNEROS-HERNANDEZ would likely need additional smugglers around the border in order to get the firearms he is organizing down into Mexico.

140. Agents identified the following Facebook page “Pedro Gonzalez”, Facebook ID# 100033987605649 with a URL of <https://www.facebook.com/profile.php?id=100033987605649>. The page in question is allegedly that of Jesus CISNEROS-HERNANDEZ. RAMIREZ provided the page to agents during an interview with agents. Agents further queried the page and view the page “Pedro Gonzalez” is Facebook friends with the pages “Elias Cobian”, “Francisco Javier

Robles”, and “Felipe Alvarez”. All individuals who are believe to operate the aforementioned pages have been identified as having a role in the firearms trafficking scheme.

141. Agents identified the Facebook page “Francisco Javier Robles”, Facebook ID# 100004315480687 with a URL of <https://www.facebook.com/francisco.j.roblesperez>. According to RAMIREZ, the page is operated by an individual known as “Chato”. “Chato” allegedly assists MOSQUEDA transporting firearms to store utilized by “Gera” in Tijuana. Agents reviewed the page “Francisco Javier Robles” and observed the page was Facebook friends with the page “Pedro Gonzalez”. Additionally, the page lists that the person behind the page is from Tonaya, Jalisco, Mexico.

142. Agents identified the Facebook page “Estrella Ele”, Facebook ID#100027983196223 with a URL of <https://www.facebook.com/etselec.zemog.7>. According to RAMIREZ, the page belongs to the “Chola” who stole firearms from CISNEROS-HERNANDEZ. Agents reviewed the page and observed predominately all photographs depicting a Hispanic female. Agents provided a photograph of Estrella C ESCALANTE (H/F, DOB: 09/14/1992) to RAMIREZ. RAMIREZ indicated this was the female who she provided the firearms. Agents compared the booking photograph of ESCALANTE to the photographs on the aforementioned Facebook page and the two appear consistent.

143. Agents identified the Facebook page “Felipe Alvarez”, Facebook ID# 100014198617273 with a URL of <https://www.facebook.com/felipe.alvarez.3150807>. According to RAMIREZ, the page belongs to an individual who provided her firearms in furtherance of the trafficking scheme. Agents observed the aforementioned page and observed the page is Facebook friends with the pages “Jesus Cisneros”, “Elias Cobian”, “Ulises Paz Garcia”, and “Pedro Gonzalez”. The page depicts a Hispanic male in predominately all of the publicly viewable

photos.

144. Agents queried Facebook and located a profile listed as “Marco Santillan”, URL: <https://www.facebook.com/marco.santillan.148>, Facebook ID: 100001767077996. Agents reviewed photographs on the publicly viewable portion of the page. Agents compared the photo on the page with a California DOT photo of Marco SANTILLAN and the two appear consistent.

SIGNIFICANCE OF FACEBOOK TO THE FIREARM TRANSACTIONS

145. ATF agents know that Facebook accounts store communications and pictures that will assist the agents in making connections to people and places involved in the suspected conspiracy to traffic firearms. All of the Facebook accounts to be searched show a connection to members of Cobian et al firearms trafficking conspiracy.

FACEBOOK COMMUNICATIONS AND FIREARMS/DRUG TRAFFICKING

146. On 11/27/2018, United States Magistrate Judge David E. Jones signed a Federal search warrant for the Facebook pages associated with Oscar Cobian, Oswaldo Cobian, Rafael Preciado, and Cristiana Cole. Facebook provided communications pursuant to this court order and the results were reviewed by ATF agents. Agents observed communications consistent with firearms trafficking, drug trafficking, reference to cartels, and illegal drug use. These communications included text messages, videos, photographs, and audio messages. The following are examples of conversations obtained consistent with firearms trafficking, narcotics trafficking, and cartel affiliation.

OSWALDO COBIAN & MARIO FERNANDEZ

147. Affiant observed communications received pursuant to a Federal search warrant between the Facebook page associated with Oswaldo Cobian and Facebook Username “Mario Fernandez” (also used “Chapparito De Oro” or “Chapparo”), Facebook ID: 100001965819835,

URL: <https://www.facebook.com/youngbull93>. The conversation was consistent with firearms trafficking and was specific to the trafficking of .50 caliber firearms. The conversation was a combination of text and recorded audio messages translated from Spanish to English. The following is a summarization of the conversation:

February 13, 2018 (audio messages):

Oswaldo sends typed message asking what Mario is up to

"MARIO FERNANDEZ": Nothing, fool. Just at home doing nothing. And you, what are you doing? Are you already working or what?

OSWALDO COBIAN: Can you get me some (a few) things from over there? Cool (.....). It's cold. Snow everywhere.

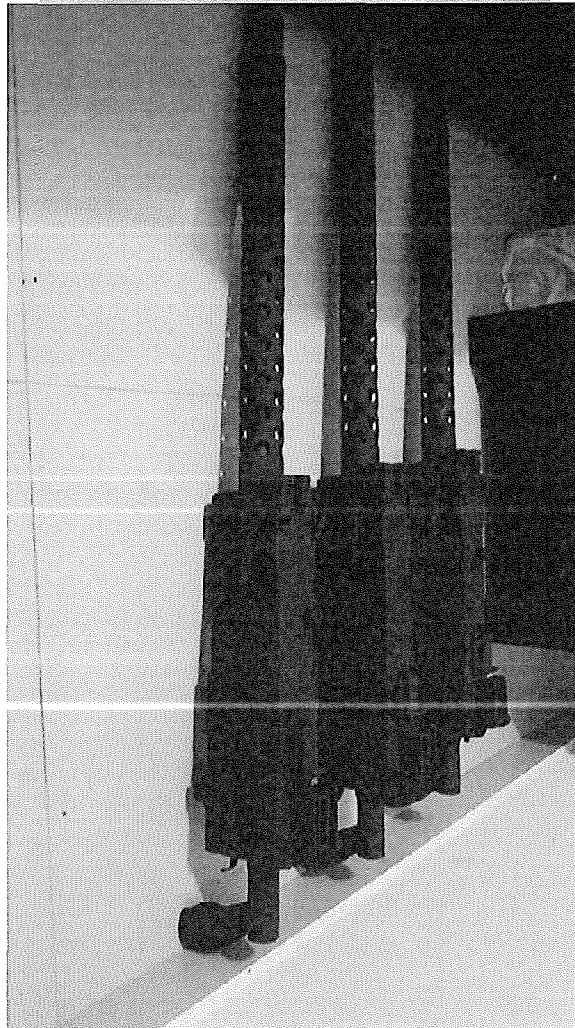
"MARIO FERNANDEZ": Well, it depends. What? Tell me what you're looking for.

OSWALDO COBIAN: (Sends picture of shoebox full of money) And that's just from what we got for those 3 "fierros" (firearms) that we got, fool.



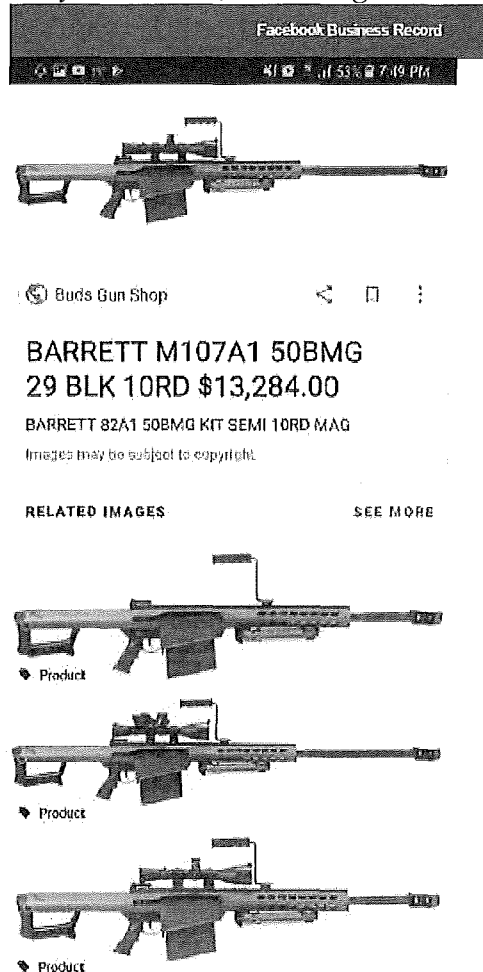
"MARIO FERNANDEZ": That's good money, foo'. Hey, fool, what's the (... "ante papas"????) called in English, fool? Don't tell me it's the one that Victor made, no? Or Marcos...with the fuckin'with hairspray and then he'd toss in a potato in. Haha. Na, kidding. What's it called, fool, that shit, in English?

OSWALDO COBIAN: (Sends picture of three Objects consistent with a Browning M2HB rifle and another picture of Objects consistent with a Browning M2HB rifle)



"MARIO FERNANDEZ": That's the 50, no?

OSWALDO COBIAN: Yes, those are 50s. let me look for the link that those fools sent me so that I could find them one of those. It's like military use. With these little fucking things ("changaderas": rounds), fool, and you fire them off and "BOOF, BOOF, BOOF" it sends them far, fool. (sends screenshot of Barrett M107A1 50BMG selling online – Buds Gun Shop for \$13,284) The one on top, I have it at my house already. Next week, I'm taking it to California, fool.



"MARIO FERNANDEZ": What are you bringing over here for? Isn't it going over there?

OSWALDO COBIAN: Yeah, fool, but that's where they go down. Through Tijuana...and that's where the guys are that take them down there (ref: Mexico). You hand it over and right there, those guys give you the money, right there in California, without having to do anything yourself—just obtain/buy/get it. The guys arrive, they give you the money and take the "cohetes" (technically firework/rOSWALDO COBIANket but slang for firearm/gun) and see you later. "MARIO FERNANDEZ": (Audio problems. Numerous audio clips with no message)

OSWALDO COBIAN: Just like the song says, fool, "just between us". Because you know how everyone is over there, the women/females and everyone, fool, they start talking and shit.

"MARIO FERNANDEZ": So do you have to take them to Tijuana or, what?, or

do they come here to California? Simon, simon, I don't even get close to there (Tijuana).

OSWALDO COBIAN: Those dudes live right there in California, fool. Real close to Los Angeles...and all I do is call them by phone and tell them where the things are and they go and pick them up and they take the money. They take care of everything, you don't have to do anything or take anything anywhere. They load the firearm to pass/cross it and everything, fool.

"MARIO FERNANDEZ": That's awesome, fool. But how the fuck am I going to do it, so that I can buy it so that I can sell it to them because I don't have money.

OSWALDO COBIAN: I also told that asshole, Cesar—he made me look bad, that son of a fucking bitch—He said, no, simon, simon, I know an Arab and all that shit. I have him here, in one week it'll all be set and it was all bullshit. He just made me believe that, the fool. And to those guys too (<- meaning: those guys (CA) believed the deal was good to go).

"MARIO FERNANDEZ": No, that guy is an asshole, he commits to shit without knowing shit. Like I said, I'm not sure but I will keep an eye out and see if one surfaces and I'll let you know.

OSWALDO COBIAN: Don't worry about that detail...Just find it, look it over well, in other words have them send photos and everything. And once you have photos and everything, I'll go---personally, if you want---and you and I will go together and get it and right there I'll give you your "earnings"/cut.

"MARIO FERNANDEZ": All set/good. Simon, fool. To give it a try/go and see if it works out (rough translation). And then you can buy it.

OSWALDO COBIAN: No, I mean, I know it's not for sure but I'm just saying if you find one, then call me asap and we can earn some quick cash. I know it's hard to find them so that's why I'm saying if you have a chance and you see one around there, make it happen, or else, don't even worry about it, fool.

"MARIO FERNANDEZ": Simon, simon, but what's that shit called, fool? The potato shooter, fool, that shit.... in English to be able to look for one. And that way, if I find one, that's why I'm saying give me the name. You're looking for a Barrett 50 and another of....of....50s regular. Those that you put underneath or on the ground or something. But send me the name of the other thing.

02/14/2018 (audio messages):

"MARIO FERNANDEZ": When you get a chance, call me...but as soon as you get a chance, call me, fool.

OSWALDO COBIAN: Give me your phone number so I can call you so that we don't talk through messenger.

"MARIO FERNANDEZ": Hey fool, I was going to tell you that I am going to talk to some guys that the guy called me....let me borrow some money, fool, you've got money. Let me borrow \$200 and on Sunday I'll pay you back, I'll send it back on MoneyGram or MoneyTransfer at the bank or whatever. Let me borrow the \$200, fool, and on Sunday I'll give it back.

OSWALDO COBIAN: *That money is in MX, fool. I don't have access to it. A compa (compadre/buddy) has it. They send me money from over there when we do our thing ("machaca"), they send me money to pay that shit and everything. That's where I get my earnings/cut. Everything is over there, fool. Right now, I don't have anything, I'm broke here in the United States.*

"MARIO FERNANDEZ": *Well, it's only \$200, fool and Sunday I'm going to give it back just because it's valentine's day and well, I wanted to get it in, you know. On Sunday, I have a jugada (may be referring to rodeo?) in Pico Rivera and they'll give me money there but I wanted money today to take the girlfriend out.*

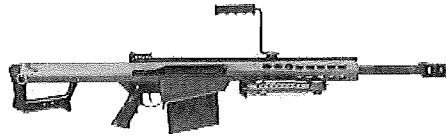
OSWALDO COBIAN: *No, well, right now I'm broke until I get paid on Friday. Like I said, all my money is over there but I don't have access to it. Those fools send me....like they're going to send me \$10k, a lady is going to bring it over here to the United States and it's going to be deposited but until day after tomorrow they'll deposit it. But that's just to pay for the "artifact" (firearm) and to take it to califas (CA).*

"MARIO FERNANDEZ": *(Thinks OSWALDO COBIAN has money but doesn't want to let him borrow some.) Orale.*

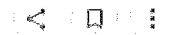
OSWALDO COBIAN: *When you go to Mexico, I'll show you, fool. The little box of dollar bills, fool. But here, like I said, I don't have money, fool. I have all of it in Mexico.*

03/05/2018 (audio and text messages):

- OSWALDO COBIAN: *"Anda ala tienda aver si te venden uno y q cuanto tiempo tardan endartelo yo boy next week para aya" - Go to the store let's see if they sell you one and how long it takes to give it to you. I'm going over there next week.*
- "MARIO FERNANDEZ": *Barret .416 rifle*
- OSWALDO COBIAN: *50 Cal*
- "MARIO FERNANDEZ": *Ok*
- OSWALDO COBIAN:



The Gun Broker



SEMI-AUTO CENTERFIRE RIFLES BRT 82A1 50BMG 2...

PRICE*
\$8,810.92

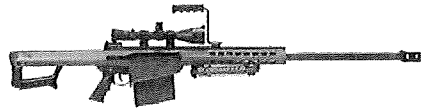
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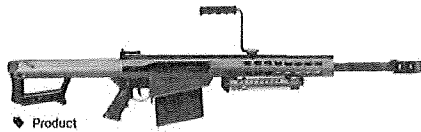
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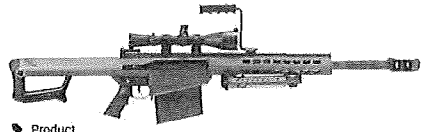
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"MARIO FERNANDEZ": Hey, fool, I was going to ask you um isn't there another caliber they might want to get, one a little smaller or something? Because here in California, dude, it's bullshit, the laws don't let you—they don't sell those here, fool. I have to go another state, to Oregon or to Arizona. Arizona is right here, close by but do you think they'd want something smaller, a smaller caliber like almost a 50...like here the ones they sell, the largest are 0.416cal Barrett. It's like the 50 but it's...it's....I'll send you a link so you can see them and you can show them and see if they want one or what.

OSWALDO COBIAN: (sends screenshot of Semi-auto centerfire Rifle BRT 82A1 from The Gun Broker online for \$8,810 and sends Barrett M107A1 50 BMG link from Buds Gun Shop again for \$13,284) The one in the photo, on the bottom, fool. The one with the longest "canon" (barrel? Not sure), 'cause there's a photo of one with a short "cañon" and one with a long canon. Long canon is better.

"MARIO FERNANDEZ": Okay, fool, but in California that shit's not sold. I'd have to go to Arizona for one.

OSWALDO COBIAN: Look, fool, if you go to Arizona, or whenever you are out there looking around, investigate/check it out and we can make some money, fool. —refences the internet----- (3/5/18 15:58CST) Just investigate and make sure they can make them awesome.

“MARIO FERNANDEZ”: I will go myself, fool. I’ll drive out there. Anyway, I don’t have a record on my drivers license so, there’s no reason to dig in to me. I’ll go and come back real quick. Fool, look, I can go to Arizona right now, if I want to but all I need is money to put gas in the truck. I already put new tires on the truck and all that shit. All I need is to put gas in and go over there to check out the stores and how much they’re selling them for and how the show is out there and I’ll buy one real quick out there.

(CORRESPONDING TEXTS)

- *OSWALDO COBIAN: “Pues investiga a comp Los puedes agarrar” – Well, investigate/find out how you can get them.*
- *“MARIO FERNANDEZ”: Ok*
- *OSWALDO COBIAN: “Y Los q tengan ai Arizona hay muchos ai Los asen” – And the ones they might have in Arizona, there’s a lot, they make them there.*

148. Affiant observed an additional Facebook conversation received pursuant to a Federal search warrant between the Facebook page associated with Oswaldo Cobian and “Mario Fernandez”. The conversation was consistent with the trafficking of Kel-Tec PMR 30, .22 WMR pistols. The following is a summarization of that conversation:

April 09, 2018:

OSWALDO COBIAN and MARIO FERNANDEZ exchange phone calls

- *OSWALDO COBIAN: “Fijate si me puedes conseguir unas pmr 30” – See if you can get me some PMR 30s (PMR 30 is a reference to the Kel Tec, model PMR 30, .22 WMR caliber pistol).*
- *OSWALDO COBIAN: “Son cortas” – They are short.*
- *OSWALDO COBIAN: “Vienen con dos cargadores” – They come with two magazines (pistol magazines).*

OSWALDO COBIAN sends the following picture:



- MARIO FERNANDEZ: “So wey” –Yes, fool and follows with a thumbs up emoji.
- MARIO FERNANDEZ: Si
- OSWALDO COBIAN: “Preguntas xfa” – Ask him/them (not Mario)
- OSWALDO COBIAN: “Y si si te mando la feria” – And if yes, I can send you the money

Series of telephone calls made by MARIO FERNANDEZ to OSWALDO COBIAN

- OSWALDO COBIAN: “Pasame la direccion wey no bamos a durar ni 15 min” – Give me the address fool we be there 15 minutes
- MARIO FERNANDEZ: Ok
- MARIO FERNANDEZ: 626417
- MARIO FERNANDEZ: 7365
- OSWALDO COBIAN: “Ese es tu numero” – This is your number?
- OSWALDO COBIAN: ?

- MARIO FERNANDEZ – “Si” – yes
- OSWALDO COBIAN: “Pasame la direccion” – Send me the address
- OSWALDO COBIAN: “Para pasar el dato” – To pass the info
- OSWALDO COBIAN: “Y mirarnos hay” – And meet up there
- MARIO FERNANDEZ: 20091 Myron st perris ca 92570

OSWALDO COBIAN and MARIO FERNANDEZ exchange telephone calls

- OSWALDO COBIAN: “Q asen wey” – What are you doing, fool?
- OSWALDO COBIAN: “Te hable wey y nunca me respondistes carbon” – I called and you didn’t respond, bastard.
- OSWALDO COBIAN: “Me mandaba puro buzón” – I keep getting sent to the mailbox (voicemail)

MARIO FERNANDEZ makes two telephone calls to OSWALDO COBIAN

- MARIO FERNANDEZ – “Pasame tu number” – Send me your number
- OSWALDO COBIAN: 4143661114
- MARIO FERNANDEZ – “Wey ya tengo mi cell” – Fool I already have my cell
- OSWALDO COBIAN: “Cual cel wey” – Which cell, fool
- OSWALDO COBIAN: “El fin q viene bamos a llamar” – We’re going to call this coming weekend
- MARIO FERNANDEZ: Ok
- MARIO FERNANDEZ: 6264177365

149. A query for “Mario Fernandez” was conducted in the CA DOT database utilizing the information in the above conversation. Affiant located a Mario Fernandez, DOB: 08/08/1993, residing at 20090 Verta Street, Perris, California. The CA DOT photograph and the publicly viewable images posted to Facebook appear to be the same person.

FACEBOOK COMMUNICATIONS: OSCAR COBIAN (of California), OSWALDO

COBIAN, & HECTOR CORRALES

150. Affiant observed a Facebook conversation consistent with firearms trafficking between the Facebook pages associated Oswaldo Cobian and Facebook page with the username “Oscar Cobian” who was a different person than the aforementioned Oscar Cobian that lived in Wisconsin. Your Affiant observed the profile page and saw this person was much larger than the Oscar Cobian of Wisconsin. In addition, this Oscar Cobian listed Pico Rivera, California, as the town where he currently resided and Tonaya, Mexico, as where he is “from”. Affiant was able to compare a state of California driver’s license photo for Oscar Cobian (DOB: 10/14/1982) of 9206 Olympic Boulevard, Pico Rivera, CA, to publically viewable photographs from the above Facebook page and believed them to be the same person. Affiant also believes these subjects may be cousins.

151. On August 26th, the Oswaldo Cobian and the above Facebook page engaged in a conversation (translated from Spanish) as follows:

Oscar: (slang greeting/ ‘what’s up?’)

Oswaldo: What’s up?

Oscar: Are you still in Tonaya?

Oswaldo: Maybe I’ll go visit you next week. Just keep it a secret/ shush about it.

Oscar: Okay, you know.

Oswaldo: (sends thumbs up sticker)

Oscar: Fool, I’ve got another job for you...of that (same thing), if possible/ if you can.

Oswaldo: let’s hear it. Tell me.

Oscar: Of the same (things/ones), but that they arrive in Sinaloa

Oswaldo: Your boss’ is already at the house. No fool, I won’t set foot in Sinaloa.

Oscar: They're friends of mine/ compadres

Oswaldo: Tell them that instead, I'll buy whichever ones they have in Cali

Oscar: Well, that's why you sell them (firearms) to them (people). When you come, you can talk to my friend/compa

Oswaldo: What do they need?

Oscar: Well, firearms

Oswaldo: What kind?

Oscar: I'll tell you in a second

152. On August 30, 2018, Oscar Cobian sends Oswaldo Cobian a screenshot of a conversation between Oswaldo Cobian and "Hector Corrales".



The object visible in the photograph is consistent with an AR15 or M4 style rifle and magazines. The above conversation was translated from Spanish. Written on the photograph

sent by “Hector Corrales” is “Lla tengo dos destos”. This is translated as “I already have two of these”, which is believed to mean “Hector” is declaring he has two of these rifles.

Oswaldo Cobian responded, “y alrato le aviso” and “simon”. Translated this means “Later I’ll advise you” and “Of course” or “yes” in Spanish slang. “Hector Corrales” sends the following communications in text format, “Lla tengo dos destos” (I already have two of these). “Y con estos crgadores cada uno” (And each one, with these magazines). “Este es un M4colt” (This is an M4 Colt). Affiant knows that Colt is a manufacturer of M4 and AR15 style rifles. “Primo primo kiero 50 aparatitos” (Cousin, cousin, I want fifty gadgets). Affiant believes gadgets is used in place of rifles or firearms.

153. Oswaldo Cobian and Oscar Cobian engaged in a conversation regarding the above screenshot and M4 style rifles. The conversation was a combination of texts and audio messages that were translated from Spanish to English. The following a summary of the communications:

- OSCAR COBIAN: “Es mi compa el q digo” – It’s my friend I told you about.
- OSWALDO COBIAN: “Pero no te entiendo” – But I don’t understand (you).
- *Call made by OSWALDO COBIAN to OSCAR COBIAN*
- OSWALDO COBIAN: “Hey se foto esta madre” – Hey, this thing got messed up
- OSCAR COBIAN: “Heyy”
- OSWALDO COBIAN: “Q pedo” – What’s up (slang)
- OSCAR COBIAN: “Orita lo agrego en grupo” – I’ll add you to the group
- OSWALDO COBIAN: “Nel” – Nope
- OSCAR COBIAN: ok
- OSCAR COBIAN: “Pos como le aemos” – Well, then how do we do it?
- OSCAR COBIAN: “q le digo o que” – What do I tell him or what?
- OSWALDO COBIAN: “Q cuanto da x cada uno aver si los busco” – That how much will he give for each one, and I’ll look for them
- OSWALDO COBIAN: “Aver si me conviene” – To see if it’s worth it
- OSWALDO COBIAN: “Y q tengo 50 caliber tambien” – And that I have a .50 Caliber also.
- OSCAR COBAIN: Well, ask him if he can send you some photos to see what shape their in, if they’re new, if they’re beat up, ask them their price and see what comes of it...to see if we can work something out...
- OSCAR COBIAN: What happened/what’s up? I went to the bathroom.
- OSWALDO COBIAN: I’ll call you later. I’m driving.
- OSCAR COBIAN: Okay.

154. The profile picture for “Hector” was compared to a profile picture listed to a Facebook profile listing username “Hector Corrales”, URL: <https://www.facebook.com/hector.corrales.7>, Facebook ID: 100002112730064. This profile was listed under the “Friends” section of the above Facebook page for Oscar Cobian from California. The photograph in the above screenshot matched the screenshot listed to the Facebook profile for “Hector Corrales”. Affiant also observed Oswaldo Cobian and Oscar Cobian had Facebook Friends in common.



155. Affiant reviewed the Facebook page of “Hector Corrales” and noticed he claimed to live in Culiacan, Sinaloa, Mexico. However, further research revealed he had family ties to Pico Rivera, California. An inquiry was conducted of the California Department of Transportation (CA DOT) and a record for Hector R. Corrales (DOB: 12/14/1988) was located. Affiant compared the CA DOT photograph to publically viewable photographs posted to the Facebook page of “Hector Corrales”, and believes these are the same person.

156. Affiant further reviewed photographs on the Facebook page of Hector Corrales and found photographs and posting consistent with the type found on Facebook pages associated with Mexican cartels. These photographs include subjects wearing masks, donning body armor, and carrying items consistent with AR15 and AK47 rifles. There is also a photograph consistent with a religious alter or offering. In the offering is a pistol, a statue of Jesus Malverde, and a statue of Santa Muerte. Affiant knows from training and experience that Jesus Malverde and Santa Muerte are Mexican folk saints that are symbols associated with cartels in Mexico. Furthermore, there were photographs of a subject with items consistent with Barrett, .50 caliber rifles, which is a firearm that has repeatedly been purchased by the Cobian family during this investigation. Affiant also knows from training and experience that Barrett rifles are highly desired by Mexican cartel organizations.

FACEBOOK: ELIAS COBIAN & "NOE MICHEL"

157. Affiant observed conversations between Elias Cobian and Facebook Username "Noe Michel", URL: <https://m.facebook.com/profile.php?id=100013279269125>, and Facebook ID: 100013279269125 consistent with the trafficking of Kel-Tec PMR 30, .22 WMR pistols to Mexico. The following is a summarization of the conversation between the Facebook page associated with Elias Cobian and "Noe Michel":

12/18/2017:

Elias Cobian: Buddy, there's two. Under the name Elias Cobian Soto

"Noe Michel": Okay, that's good. Will there be three or just two?

Elias Cobian: Just two. My homeboy/friend wants to keep one.

"Noe Michel": Okay, that's fine. I'll put them this evening and I'll call you to give you the (clue) key/access codes

Elias Cobian: Okay

"Noe Michel": But with his name, he does have teacher/professor credentials/certifications?

Elias Cobian: Yes

"Noe Michel": Okay, I'll send you the keys/access codes this evening

Elias Cobian: Okay. I'm going to El Grullo right now. Would you be able to send me the deposit so that I don't have to go twice?

"Noe Michel": I'm far away from the house, buddy, and I don't have money with me. This evening for sure, buddy.

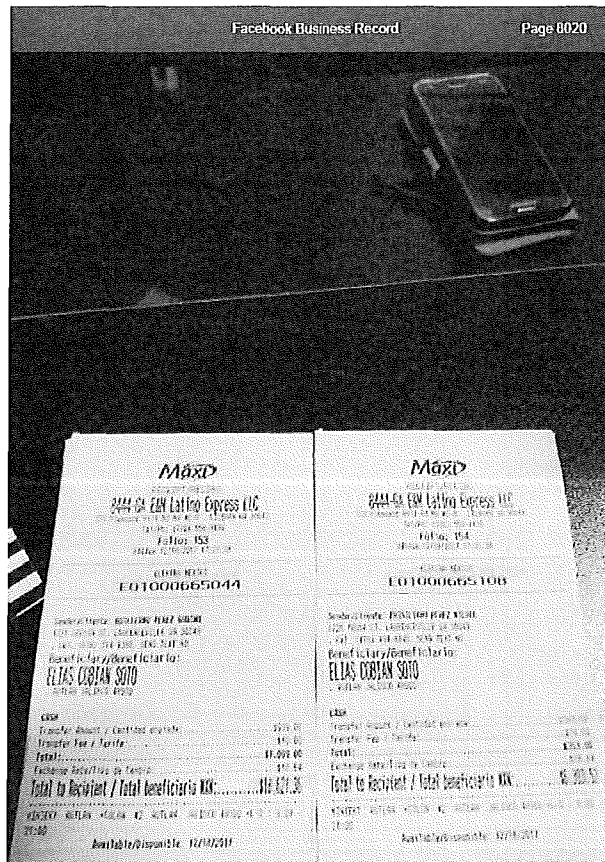
Elias Cobian: OK

"Noe Michel": Sorry, buddy, but this evening for sure it'll be there, ok?

Elias Cobian: Yeah, it's fine. No worries.

"Noe Michel": Okay, done.

("Noe Michel" Sends photo of two money wires/transfers)



Transaction E01000665044:

Remitter: E&M Latino Express Money Services, 733 Pleasant Hill Road, Suite C-8,
Lilburn, GA, 30047

Sender: GUILLERMO PEREZ GUDINO

Phone: 678/314-9380

Amount (US Currency): \$999.00,

Sender Address: 1721 Stessa Street, Lawrenceville, GA, 30043

Beneficiary: ELIAS COBIAN SOTO of Autlan, Jalisco, Mexico

Transaction E01000665108:

- Remitter: E&M Latino Express Money Services, 733 Pleasant Hill Road, Suite C-8,
Lilburn, GA, 30047

- Sender: GUILLERMO PEREZ GUDINO
- Phone: 678/314-9380
- Amount (US Currency): \$999.00,
- Sender Address: 1721 Stessa Street, Lawrenceville, GA, 30043
- Beneficiary: ELIAS COBIAN SOTO of Autlan, Jalisco, Mexico

"Noel Michel": There's the money for one, buddy. And over there, they'll pay you for the other one when they go for them (go pick them up).

Elias Cobian: Okay, when are they coming?

"Noe Michel": Do the codes show up well (in the picture)? I think tomorrow.

Elias Cobian: Yes, fine. Let me know what time so that I can wait for him.

"Noe Michel": Yeah, I'll call you one hour before they go

Elias Cobian: Okay, good to go/ all set. (sends photos of two PMR-30s) Let me know which one.



"Noe Michel": The green one seems/looks better to me, don't you think? Or which one looks better in person? I'll take/give me the green one, buddy, please.

Elias Cobian: OK

"Noe Michel": That one looks nicer, right?

Elias Cobian: I like the green one better but both are nice. I received what was sent, what time will they come for them?

JUNE 6th, 2018

"Noe Michel": What's up, buddy? How are things going?

Elias Cobian: Good, good...I'm in Tonaya. Been here 3 weeks. I return tomorrow.

"Noe Michel": Oh, are you going to be able to get me two of the same ones?

Elias Cobian: Yes, just let me arrive/get back and I'll call you.

"Noe Michel": Okay, sounds good. And if you go in August or December so that you can take them for me.

Elias Cobian: Okay.

158. Affiant knows from this investigation that Kel-Tec PMR 30, .22 WMR caliber pistols have been purchased by Oswaldo Cobian, Elias Cobian, and Rafael Preciado. Furthermore, on November 16, 2017, Oswaldo Cobian purchased a grey (tungsten) Kel-Tec PMR 30 and Elias Cobian purchased a green Kel-Tec PMR 30 from FFL Shooter's Sport Center in Racine, WI. These firearms match the same make, model, and color of the firearm discussed in the above transaction.

FACEBOOK: OSWALDO COBIAN & ROGELIO GASCA

159. Affiant observed conversations between Oswaldo Cobian and Facebook username "Rogelio Gasca", URL: <https://www.facebook.com/rogerio.gasca.14> Facebook ID 100010143872247. In one conversation Oswaldo Cobian and "Rogelio Gasca" have a conversation about "Oscar". Your Affiant believes this to be Oscar Cobian. In the conversation translated from Spanish, Oswaldo Cobian tells "Rogelio Gasca" that Oscar is "conectado" or "connected" in English. Affiant knows that "connected" is a word that can be used to describe a person who has a membership or a relationship in an organized criminal group. The conversation (translated) is as follows:

02/18/2018

Oswaldo Cobian: Hey, you know that Oscar is connected?

“Rogelio Gasca”: Connected where?

Oswaldo Cobian: He’s not going to make it (typed in English). I don’t know, my dad just called me.

“Rogelio Gasca”: Which Oscar?

Oswaldo Cobian: I’m going to call my uncle Jose right now.

Oswaldo Cobian: Beef (typed in English)

“Rogelio Gasca”: Don’t BS/Quit Fuckin’ around, where is he?

Oswaldo Cobian: That no one pays attention to them now that no one goes to see him. I don’t know, fool.

“Rogelio Gasca”: Well, no one ever says anything, I didn’t know anything about this.

Oswaldo Cobian: So you can find out and tell the rest of them that you are over there, just don’t tell them that I told you/gossiped about it.

“Rogelio Gasca”: Okay, thanks cousin.

Oswaldo Cobian and “Rogelio “Gasca” also engaged in a conversation regarding “cricri”. Affiant knows this is slang for methamphetamine, AKA “crystal meth”.

The following is a summarization of the conversation translated from Spanish:

04/29/2018

Oswaldo Cobian: “Consigueme cricri para el sabado aun mamadas” – Can you get me some meth for Saturday for a blowjob

“Rogelio Gasca”: “Simon, wey” - Yes, fool

Oswaldo Cobian: “Yo te doy la feria ami me quieren dar pero libras enteras y no quiero tanta” – I’ll give you money. They want to give me pounds but I don’t want that much.

160. Affiant compared CADOT photograph for Rogelio Gasca, DOB: 05/29/1974, 9525 Friendship Ave. Pico Rivera, CA, with publicly viewable Facebook photos from the above Facebook page. This appears to be the same person. Your Affiant is aware that the Cobian family travels to California and there is a possibility that Oswaldo Cobian could indeed receive methamphetamine from Rogelio Gasca to transport to the Eastern District of Wisconsin.

FACEBOOK: OSWALDO COBIAN & JOSH SIPPLE

161. Affiant observed conversations between the Facebook page associated with Oswaldo Cobian and Facebook username “Josh Sipple”, User ID 1752717630, and URL <https://facebook.com/josh.sipple.7>. The conversation was consistent with illegal drug trafficking. The following messages were observed:

03/21/2018

Oswaldo Cobian: I have new and better candy

Sipple: Oh yeah. Where you working?

Oswaldo Cobian: disel cush – (Affiant knows that “cush” is a type of potent marijuana)

Sipple: I’ll take some price

Oswaldo Cobian: In Bensenville. 170 once

Sipple: you got my personal numbers. 9204000482

Oswaldo Cobian: But I will give you sample

Sipple: Send me a couple picks awesome

Oswaldo Cobian: That's why I was calling you the other day

Sipple: yeah, I kinda figured that. I was playing phone tag with you and then my work phone is junk. They are sending me a new one

Oswaldo Cobian: Lol (sends photo of a plant-like substance consistent with marijuana packaged in plastic bags)

Sipple: Hahaha hell yeah Well shit Sunday I am driving to Wisconsin for my nieces bday. On the way home back thru Milwaukee I could swing by and grab one from you if that's cool? Just send me your address and give me your personal number

Oswaldo Cobian: 414 36611114 Sorry 4143661114

Sipple: Awesome

Oswaldo Cobian: Calme when you are on your way and iguive you mi a dress I have received your text

Sipple: Awesome will do

OC: (sends thumbs up)

162. Affiant believes Josh Sipple is Joshua Sipple (DOB: 06/06/1986) who previously resided in Wauwatosa, WI, and now resides in Chicagoland. A WIDOT photograph of Joshua Sipple was reviewed and his appearance appeared consistent with the images posted on the publically viewable portion of the aforementioned Facebook page.

REVIEW OF FACEBOOK PAGES OF LAURA Y. RAMIREZ

163. ATF agents received the Facebook communications of Laura Y. RAMIREZ pursuant to a Federal search warrant signed by United States Magistrate Judge David Jones on April 26, 2019. Affiant observed RAMIREZ was previously "Facebook Friends" with profile

“Jesus Cisneros”, ID# 100032353987887, and URL:
www.facebook/profile.php?id=100032353987887.

164. A review of the above profile for “Jesus Cisneros” did not have a profile photograph visible. However, it did have common “Facebook Friends” with the other Facebook profiles associated with Jesus “Chindu” CISNEROS. Agents also viewed a conversation between RAMIREZ’S Facebook page and Facebook username “Richard P Mosqueda,” ID #100004091722706 and URL www.facebook.com/richardp.mosqueda. The conversation appeared consistent with subjects engaged in the illegal smuggling of goods into Mexico from the United States on behalf of a third party or organization. The conversation is consistent suspects and the similar gun smuggling scheme discussed by SOI-1. The following are summarizations of these conversations (translated from Spanish to English):

5/21/18

Richard P Mosqueda: Hi Laura do you know anything about the job?

Laura Ramirez: Didn’t “Gera” talk to you?

5/22/18

Richard P Mosqueda: No, he hasn’t spoken with me the truth is that I need to get some money together for my sister’s thing and for my youngest daughter’s birthday on Saturday and I don’t want the same thing to happen to me like with my other daughter because of “turi” (0%) I wasn’t able to do anything for her birthday see if you can get in touch with him I sent him a WhatsApp but he hasn’t even opened it if you can do it please.

(Laura Ramirez) : Yes he told me that he was going to call tomorrow because he has something pending for you only he didn’t tell me what time. I think that maybe before noon/midday.

Richard P Mosqueda: Ah, okay, laurita it's just that it's urgent for me and we are still owed for the last trip. Once I get paid, I'll give you your money ok. I barely have gasoline to get there/ get over there.

Laura Ramirez: I'll call him tomorrow to see what your cut is, he said that something good came up for tomorrow, well, today, Tuesday. Yes, I already told him that money is needed. Hopefully it'll turn out well for us.

Richard P Mosqueda: Okay Laura, thanks, do you think he's in his office to see if he can give me something right now?

Laura Ramirez: I don't know, the truth is I haven't spoken to him since evening but let me send him a message and see if he is connected (online/avail).

Richard P Mosqueda: Thanks, Laura

Laura Ramirez: He hasn't gotten back to me but once he responds I'll let you know

11/04/18

Richard P Mosqueda: Laura hi Chuy wants you to call him please (SA Arnold knows from experience that "Chuy" can be slang for Jesus)

11/5/18

Richard P Mosqueda: Hi

Laura Ramirez: Hi

Richard P Mosqueda: What happened did he tell you anything

Laura Ramirez: He's still seeing what's coming this week, I only have 1000 I don't know if they are going to order for more to be brought. How are things going for the things out of Chicago? Have you spoken to him?

Richard P Mosqueda: From the dress that I wanted, I haven't received anything and the

rest I only received what you sent with your sister.

Laura Ramirez: Have you crunched numbers with him? (have you run your numbers with him/ what he owes you)

Richard P Mosqueda: No yesterday, when I called/spoke to him, he told me that there would only be whatever you had....from the pick up....i'll call you when I cross.

Laura Ramirez: ok let me know

Richard P Mosqueda: (thumbs up)

11/6/18

Richard P Mosqueda: Hey Laura, Chuy said that he told you yesterday to give me \$1000

Laura Ramirez: so \$1000? I didn't understand anything he said. Okay, that's fine.

Richard P Mosqueda: yes, he just confirmed with me right now. We'll talk later.

Laura Ramirez: ok perfect.

Richard P Mosqueda: (thumbs up)

11/11/18

Richard P Mosqueda: HI

Laura Ramirez: Hi

Richard P Mosqueda: you called me?

Laura Ramirez: Chuy wants to talk to you

Richard P Mosqueda: yes, I spoke to him yesterday

11/27/18

Richard P Mosqueda: HI laura

Laura Ramirez: Hi

Richard P Mosqueda: how are you

Laura Ramirez: good and you

Richard P Mosqueda: Listen, what's all this about there is going to be another person and who is it that we're going to deal with now? Fine/ well, too. (<- responding to "how are you")

Laura Ramirez: I honestly don't know they haven't told me anything and they haven't called me or anything but from what I understand it'll no longer be Chuy, that's all I know.

Richard P Mosqueda: That's doesn't sit well with me because he still owes me

Laura Ramirez: I just started working 6 days a week because I don't know what's going to happen. You haven't spoken to him/ Have you spoken to him?

Richard P Mosqueda: I know, they have us totally abandoned (cut off, out of the loop)

Laura Ramirez: yes, that's the truth, I don't even know how to "move" (what to do, how to go about things)

Richard P Mosqueda: yes but he only tells me that how many pencils are left

Laura Ramirez: I was in communication with one person for the customs crossing (la crusada de la aduana) but there's no way if there's no money. *sigh/ ugh.

Richard P Mosqueda: I know. But then how did you know about Chuy?

Laura Ramirez: When he called me about giving you the money

Richard P Mosqueda: Oh, so he, himself, told you. And he hasn't said anything to me.

Laura Ramirez: Well, that's what I understood. He hasn't told me anything more.

Richard P Mosqueda: And I keep taking out pencils and there's still more. Pencils and a lot/bunch of staples. (Yahaira Laurita/Laura Ramirez) LR: That's why I'm trying to get in touch with/ communicate with the one that crosses, but since I don't know him, I don't

know if I can trust him. If you want, within the next few days, we can both call him and see. Because supposedly, he crosses only cars but maybe once there, he'll "buck up" and do it (can also be said: he'll be willing to do it) all that is needed is the money

(Richard P Mosqueda) RM: Okay. We'll see when we can see each other so we can have a good/clear talk

Laura Ramirez: whenever you'd like. I'm working only evenings right now

165. Affiant located a California Department of Motor Vehicles (DMV) photograph for Richard Padua MOSQUEDA (DOB: 11/29/1966) of Chula Vista, California. The CA DMV photograph Richard Padua MOSQUEDA matched the appearance of the publicly viewable photographs from the Facebook page of "Richard P Mosqueda."

166. SOI-1 reviewed a photograph of MOSQUEDA. He/She advised it had been some time since he had met with MOSQUEDA, but believed the photograph was the second subject he met with in California who SOI-1 provided firearms to and that were purchased in the scheme for CISNEROS. SOI-1 described one of the people as a man with a "crooked eye" and a Ford F-150 (this is believed to be Richard Padua MOSQUEDA (DOB: 11/29/1966)).

167. ATF agents confirmed that MOSQUEDA has crossed the U.S. border near Tijuana, Mexico, approximately 282 times in the last 18 months. Affiant knows this can be a strong indicator of a smuggler.

FACEBOOK INFORMATION GENERALLY

168. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the

general public.

169. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers (for password retrieval), physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

170. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

171. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

172. Facebook users can create profiles that include photographs, lists of personal

interests, and other information. Facebook users can also post “status” updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,” such as social occasions, by listing the event’s time, location, host, and guest list. In addition, Facebook users can “check in” to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user’s profile page also includes a “Wall,” which is a space where the user and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

173. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

174. Facebook users can exchange private messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient’s “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a Chat feature that allows users to send and receive instant messages through Facebook. These chat communications are stored in the chat history for the

account. Facebook also has a Video Calling feature, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

175. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

176. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (*i.e.*, non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

177. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

178. Each Facebook account has an activity log, which is a list of the user’s posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as “liking” a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user’s Facebook page.

179. Facebook Notes is a blogging feature available to Facebook users, and it enables users to write and post notes or personal web logs (“blogs”), or to import their blogs from other services, such as Xanga, LiveJournal, and Blogger.

180. The Facebook Gifts feature allows users to send virtual “gifts” to their friends that appear as icons on the recipient’s profile page. Gifts cost money to purchase, and a personalized message can be attached to each gift. Facebook users can also send each other “pokes,” which are free and simply result in a notification to the recipient that he or she has been “poked” by the sender.

181. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

182. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications (“apps”) on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user’s access or use of that application may appear on the user’s profile page.

183. Some Facebook pages are affiliated with groups of users, rather than one individual user. Membership in the group is monitored and regulated by the administrator or head of the group, who can invite new members and reject or accept requests by users to enter. Facebook can identify all users who are currently registered to a particular group and can identify the administrator and/or creator of the group. Facebook uses the term “Group Contact Info” to describe the contact information for the group’s creator and/or administrator, as well as a PDF of the current status of the group profile page.

184. Facebook uses the term “Neoprint” to describe an expanded view of a given user profile. The “Neoprint” for a given user can include the following information from the user’s profile: profile contact information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends’ Facebook user identification numbers; groups and networks of which the user is a member, including the groups’ Facebook group identification numbers; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Facebook applications.

185. Facebook also retains Internet Protocol (“IP”) logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address

on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

186. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

187. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook user's "Neoprint," IP log, stored electronic communications, and other data retained by Facebook, can indicate who has used or controlled the Facebook account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook

account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to “tag” their location in posts and Facebook “friends” to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner’s state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner’s motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

188. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

TECHNICAL TERMS

189. Based on my training and experience, I use the following technical terms to convey the following meanings:

190. IP Address: An Internet Protocol address (or simply “IP address”) is a unique

numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.

191. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

REQUEST FOR SEALING

192. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may give targets an opportunity to flee/continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, notify confederates, or otherwise seriously jeopardize the investigation.

ATTACHMENT A
Property to Be Searched

This warrant applies to information between January 1, 2017 and present date associated with the following Facebook pages:

- Facebook username “Richard P Mosqueda”, ID #100004091722706 and URL www.facebook.com/richardp.mosqueda
- Facebook username “Estrella Ele”, ID# 100027983196223 and URL <https://www.facebook.com/etselec.zemog.7>
- Facebook username “Pedro Gonzalez”, ID# 100033987605649 and URL <https://www.facebook.com/profile.php?id=100033987605649>
- Facebook username “Francisco Javier Robles”, ID# 100004315480687 <https://www.facebook.com/francisco.j.roblesperez>
- Facebook username “Felipe Alvarez”, ID# 100014198617273 and URL <https://www.facebook.com/felipe.alvarez.3150807>
- Facebook username “Marco Santillan”, ID# 100001767077996 and URL <https://www.facebook.com/marco.santillan.148>

That are stored at premises owned, maintained, controlled, or operated by Facebook, a social networking company headquartered in Menlo Park, California.

ATTACHMENT B
Particular Things to be Seized

Information to be disclosed by Facebook

1. To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each user ID listed in Attachment A:

- a. All contact and personal identifying information, including: full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.
- b. All activity logs for the account and all other documents showing the user's posts and other Facebook activities;
- c. All photos uploaded by that user ID and all photos uploaded by any user that have that user tagged in them;
- d. All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;

- e. All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending “Friend” requests;
- f. All “check ins” and other location information;
- g. All IP logs, including all records of the IP addresses that logged into the account;
- h. All records of the account’s usage of the “Like” feature, including all Facebook posts and all non-Facebook webpages and content that the user has “liked”;
- i. All information about the Facebook pages that the account is or was a “fan” of;
- j. All past and present lists of friends created by the account;
- k. All records of Facebook searches performed by the account;
- l. All audio messages sent by the account and messages received by the account;
- m. All video messages sent by the account and to the account;
- n. Any and all location data that is recorded by Facebook related to the account
- o. All information about the user’s access and use of Facebook Marketplace;
- p. The types of service utilized by the user;
- q. The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- r. All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;

- s. All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

Information to be seized by the government

1. All information described above that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C § 922(a)(1)(A) (engaging in a firearms business without a license), § 922(d) (transferring a firearm to a prohibited person), and § 18 U.S.C § 544 (smuggling good from the United States), 18 U.S.C. § 922(a)(1) (false statement to a material fact to FFL), 18 U.S.C. § 924(b) (interstate/foreign shipment for felony purpose), 18 U.S.C. § 922(a)(9) (non-resident/non FFL received firearms), 18 U.S.C. § 924 (h) (transfer firearm to be used in drug trafficking crime), 18 U.S.C. § 924(g) (interstate travel with intent to commit drug trafficking crime), 22 U.S.C. § 2778(b)(2)(c) (illegal export of munitions), and 18 U.S.C. § 371 (conspiracy), since January 1, 2017 to the present, for each user ID identified on Attachment A, information pertaining to the following matters:

- a. The relevant offense conduct, any preparatory steps taken in furtherance of the scheme, communications between the suspect and others related to the relevant offense conduct in the above-listed crimes;
- b. Evidence indicating how and when the Facebook account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;
- c. Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;

- d. The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).
- e. The identity of the person(s) who communicated with the user ID about matters relating to relevant offense conduct of the above-listed crimes, including records that help reveal their whereabouts.
- f. Based on the forgoing, I request that the Court issue the proposed search warrant based on the aforementioned facts.